

US EPA RECORDS CENTER REGION 5



436343

**RECORDS COMPILATION AND
POTENTIALLY RESPONSIBLE PARTY SEARCH**

**MASTER SERVICES AGREEMENT
SUPPLEMENT NO. 13**

DRAFT REPORT

Prepared for

**Indiana Department of Environmental Management
Indianapolis, Indiana**

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1.0 INTRODUCTION

Tetra Tech EM Inc. (Tetra Tech) received Master Services Agreement Supplement No. 13 from the Indiana Department of Environmental Management (IDEM) to conduct a records compilation and potentially responsible party (PRP) search for the Grand Calumet River, Indiana Harbor Ship Canal, Indiana Harbor, and Lake Michigan area of assessment (AOA). Tetra Tech was requested to research and report on 100 facilities in the AOA in support of a natural resource damage assessment (NRDA) initiated by IDEM. The NRDA process addresses natural resource damage resulting from releases of hazardous substances and oil to the waters of and habitats associated with the AOA.

The purpose of the PRP search is to conduct a file search and extract pertinent file information that identifies PRPs for the AOA so that IDEM can send notice letters to these PRPs. Based on discussions with IDEM, Tetra Tech did not conduct all the work initially outlined in Tetra Tech's March 16, 1998, letter to IDEM because of budget constraints. Instead, under IDEM direction, Tetra Tech focused on conducting the activities described in Sections 1.1 through 1.4.

1.1 CONDUCTING THE FILE SEARCH

The first activity conducted by Tetra Tech was a file search. IDEM initially provided Tetra Tech with a list of 100 facilities. At IDEM's request, one facility, Conservation Chemical of Illinois, was added to the list and one facility, Hammond Sanitary District, was eliminated from the list because it was located outside the AOA. Tetra Tech found that 12 facilities had already received a PRP notice letter from IDEM. These 12 facilities are identified below.

- | | |
|-------------------|----------------------------|
| • Amoco | • DuPont |
| • LTV Steel | • Mobil Oil |
| • Inland Steel | • Phillips Pipe Line |
| • GATX | • Rubber Materials |
| • Georgia-Pacific | • Clark Materials Handling |
| • U.S. Steel | • USS Lead Refinery |

The remaining 88 facilities were addressed during the file search. During the weeks of April 6 through 10 and April 13 through 17, 1998, Tetra Tech representatives reviewed documents in the following three file rooms identified by IDEM: (1) Environmental Response, (2) Solid and Hazardous Waste Management, and (3) Water Management. Tetra Tech reviewed all the documents available for the 88 facilities in the Environmental Response and Solid and Hazardous Waste Management file rooms. Based on discussions with IDEM, Tetra Tech reviewed only facility documents dated 1994 to present in the Water Management file room.

1.2 FLAGGING AND PHOTOCOPYING DOCUMENTS

The second activity that Tetra Tech conducted was flagging and photocopying facility documents pertinent to the PRP search. The files for the 88 facilities were reviewed, and documents were flagged if they identified a connection with releases of hazardous substances or oil and consequent damage to natural resources in the AOA. If a document identified a release at a facility, information relating to the type of hazardous substance or oil released and the direct or indirect migration pathway of the substance was flagged, as available.

Of the 88 facilities, 58 had documents in at least one file room that were flagged and photocopied, 4 had documents in at least one file room that were found in a different facility file and that were flagged and photocopied (see Table 1-1 on page 3 and Table 1-2 on page 6), and 26 either did not have a file in any of the three file rooms or had a file but documents were not photocopied because the information was not pertinent to the PRP search (see Table 1-3 on page 9).

1.3 ORGANIZING DOCUMENT COPIES

The third activity that Tetra Tech conducted was to organize and baste stamp document copies for the 62 facilities listed in Tables 1-1 and 1-2. After the documents were flagged and photocopied at the IDEM offices, the document copies were taken to the Tetra Tech Chicago office, where they were organized and baste stamped. The document copies were first organized by PRP name in alphabetical order. Tetra Tech allotted three folders for each PRP, each folder representing one of the three file rooms. The document copies in each folder were organized in reverse chronological order. After all the document copies were organized, they were baste stamped in the lower, right-hand corner.

1.4 PREPARING THE PRP SEARCH REPORT

The fourth activity that Tetra Tech conducted was to extract pertinent information from the document copies and compile it into this report for use by IDEM personnel. Information considered pertinent relates to facility operating and waste disposal practices, accidental releases, or other information that might link a facility to contamination of the AOA.

Section 2.0 of this report summarizes the pertinent information for all 62 facilities whose documents Tetra Tech flagged and photocopied. Section 3.0 provides a summary of the other possible PRPs identified in the facility summaries in Section 2.0 as well as recommendations for follow-up activities. The other possible PRPs identified in the facility summaries are either (1) newly identified possible PRPs or (2) possible PRPs previously identified in the 1996 IDEM document titled "Draft: Potentially Responsible Parties for Grand Calumet River/ Indiana Harbor Ship Canal (GCR/IHSC) Contaminated Sediments." For each other possible PRP previously identified by IDEM, a summary of pertinent information is provided in Section 2.0. Such summaries are not provided in Section 2.0 for newly identified possible PRPs. Documents pertinent to the newly identified possible PRPs may be present in the IDEM file rooms, but because these parties are not included on the facility list provided by IDEM, Tetra Tech did not attempt to locate or review files for them.

TABLE 1-1

62 FACILITIES WITH DOCUMENTS PHOTOCOPIED

Facility Name	File Room		
	Environmental Response ^a	Solid and Hazardous Waste Management ^b	Water Management ^c
American Juice Inc.	Documents photocopied ^d	No documents ^e	Documents photocopied
American Steel Foundries	Documents photocopied	Documents photocopied	Documents photocopied
AMG Resources Corporation	No documents photocopied ^f	Documents photocopied	No documents photocopied
Anderson Development Company	Documents photocopied	No documents	Documents photocopied
ASK Shredders Inc.	Documents photocopied	Documents photocopied	No documents
Beaver Oil Co., Inc.	Documents photocopied	Documents photocopied	Documents photocopied
Central States Marketing ^g	No documents	No documents	No documents
Chase Street Industrial Center	No documents	No documents	Documents photocopied
Chicago Flame Hardening	No documents photocopied	Documents photocopied	No documents
Chicago Steel Limited, Inc.	No documents	Documents photocopied	Documents photocopied
Citgo Petroleum Corporation	Documents photocopied	Documents photocopied	Documents photocopied
Conservation Chemical of Illinois	Documents photocopied	No documents photocopied	No documents
Cummins Northern Illinois	No documents	Documents photocopied	Documents photocopied
Dixie Dairy Company	No documents photocopied	No documents	Documents photocopied
East Chicago Industrial Center ^h	No documents	No documents	No documents
East Chicago Sanitary District	No documents photocopied	Documents photocopied	Documents photocopied
Energy Cooperative, Inc.	Documents photocopied	Documents photocopied	No documents
Explorer Pipeline Company	Documents photocopied	No documents photocopied	Documents photocopied
Flying J Inc.	Documents photocopied	Documents photocopied	Documents photocopied
Gary Development Company, Inc.	Documents photocopied	Documents photocopied	Documents photocopied
Gary Public Transportation Corporation	Documents photocopied	Documents photocopied	No documents
Gary Regional Airport, City of Gary	Documents photocopied	Documents photocopied	Documents photocopied
Gary Sanitary District	Documents photocopied	No documents photocopied	Documents photocopied
Gary Sanitary Landfill, City of Gary	No documents photocopied	Documents photocopied	Documents photocopied
Harbison Walker Refractories	No documents photocopied	Documents photocopied	Documents photocopied
House's Junk Yard, Arnold House	Documents photocopied	No documents	No documents
Indiana Industrial Investments	No documents	No documents	Documents photocopied
Industrial Disposal Corp.	Documents photocopied	Documents out ^h	No documents
Industrial Scrap Corporation	Documents photocopied	No documents photocopied	No documents
Inland Detroit Diesel-Allison	No documents	Documents photocopied	No documents
Metal Recovery Industries, Inc.	No documents	Documents photocopied	No documents
Methodist Hospital-Northlake	Documents photocopied	No documents photocopied	Documents photocopied
Mid-Continental Coke Company	Documents photocopied	No documents	No documents
Mid-West Flame Hardening	No documents	No documents	Documents photocopied
Miller and Company	No documents	Documents photocopied	No documents

TABLE 1-1 (Continued)

62 FACILITIES WITH DOCUMENTS PHOTOCOPIED

Facility Name	File Room		
	Environmental Response ^a	Solid and Hazardous Waste Management ^b	Water Management ^c
National Processing Corp. ⁸	No documents	No documents photocopied	No documents
National Recovery Systems	No documents	No documents	Documents photocopied
NEO Industries, Inc.	No documents	Documents photocopied	Documents photocopied
Northern Indiana Dock	No documents	No documents photocopied	Documents photocopied
Northern Indiana Public Service Company Dean H. Mitchell Generating Station	Documents photocopied	Documents photocopied	Documents photocopied
Northwest Family Hospital	No documents	No documents	Documents photocopied
Northwest Indiana Water Company	No documents	No documents	Documents photocopied
Phillips Petroleum Corporation	Documents photocopied	No documents photocopied	No documents
Praxair, Inc.	Documents photocopied	Documents photocopied	Documents photocopied
Ralston Street Lagoon, Gary Sanitary District	No documents	Documents photocopied	No documents
Republic Engineered Steels, Inc.	No documents photocopied	Documents photocopied	No documents
Robinson Steel	No documents	Documents photocopied	No documents
Roll Center, Inc.	No documents	No documents photocopied	Documents photocopied
Rubber Material Handling, Inc.; East Chicago Enterprise Center	No documents	Documents photocopied	No documents
Safety-Kleen Oil Recovery Company	Documents photocopied	Documents photocopied	Documents photocopied
Samocki Brothers Trucking Company	No documents	Documents photocopied	Documents photocopied
Shell Oil Company	Documents photocopied	No documents photocopied	Documents photocopied
Shell Oil Company Gasoline Stations	Documents photocopied	No documents photocopied	Documents photocopied
St. Mary Medical Center ^d	No documents	No documents photocopied	No documents
Tri State Coach Lines, Inc.	Documents photocopied	No documents	Documents photocopied
Truckstops of America, Inc.	Documents photocopied	Documents photocopied	Documents photocopied
Union Tank Car Company	Documents photocopied	No documents photocopied	Documents photocopied
United Rail Services	Documents photocopied	No documents photocopied	Documents photocopied
United States Gypsum Company	No documents photocopied	No documents photocopied	Documents photocopied
United States Reduction Company	No documents	Documents photocopied	Documents photocopied
Viking Engineering Company, Inc.	Documents photocopied	Documents photocopied	No documents
Willet Trucking	Documents photocopied	No documents	No documents

TABLE 1-1 (Continued)

62 FACILITIES WITH DOCUMENTS PHOTOCOPIED

Notes:

- ^a All documents available for each facility were reviewed.
- ^b All documents available for each facility were reviewed.
- ^c All documents available for each facility and dated 1994 to the present were reviewed.
- ^d Documents pertinent to the PRP search were photocopied.
- ^e Documents were not available.
- ^f Documents were available but were not photocopied because they were not pertinent to the PRP search.
- ^g Documents pertinent to this facility were found in the East Chicago Sanitary District water management files.
- ^h At the time of the file search, facility documents were checked out.
- ⁱ Documents pertinent to this facility were found in the Northwest Family Hospital water management files.

TABLE 1-2

LIST OF FACILITY ADDRESSES

Facility Name	Facility Address
American Juice Inc.	One North Bridge Street, Gary 46404
American Steel Foundries	3761 Canal Street, East Chicago 46312 and 4831 Hohman Avenue, Hammond 46327
AMG Resources Corporation	459 North Cline Avenue, Gary
Anderson Development Company	3400 West Fourth Avenue, Gary 46404
ASK Shredders Inc.	415 E. 151st Street, East Chicago 46312
Beaver Oil Co., Inc.	1040 Michigan Street, Gary
Central States Marketing	Not available
Chase Street Industrial Center	700 Chase Street, Gary
Chicago Flame Hardening	5200 Railroad Avenue, East Chicago 46312
Chicago Steel Limited, Inc.	700 Chase Street, Gary 46404
Citgo Petroleum Corporation	2500 East Chicago Avenue, East Chicago 46312 and Service Stations at - 4301 Cleveland Avenue, Gary 46408 - 1205 West Chicago Avenue, East Chicago 46312 - 845 North Broad Street, Griffith 46319
Conservation Chemical of Illinois	6500 Industrial Highway, Gary 46404
Cummins Mid-States Power	1440 Texas Street, Gary 44602
Dixie Dairy Company	1200 West 15th Avenue, Gary 46407
East Chicago Industrial Center	Not available
East Chicago Sanitary District	5200 Indianapolis Boulevard, East Chicago
Energy Cooperative, Inc.	3500 Indianapolis Boulevard, East Chicago
Explorer Pipeline Company	3737 Michigan Street, Hammond, and Avenue H (between Kennedy and Cline Avenue), Griffith
Flying J Inc.	3150 Grant Street, Gary 46408
Gary Development Company, Inc.	479 North Cline Avenue, Gary 46406
Gary Public Transportation Corporation	237 West 22nd Avenue, Gary 46407
Gary Regional Airport, City of Gary	6001 West Industrial Highway, Gary 46406
Gary Sanitary District	3300 West 3rd Avenue, Gary 46402
Gary Sanitary Landfill, City of Gary	1900 Burr Street, Gary 46402
Harbison Walker Refractories	5501 Kennedy Avenue, Hammond 46323
House's Junkyard, Arnold House	Clark Street and Birch Road, Gary 46466
Indiana Industrial Investments	86 North Bridge Street, Gary 46404
Industrial Disposal Corp.	333 North Clark Road, East Chicago, and Site #10 intersection of Cline Avenue and the Indiana Toll Road, Gary
Industrial Scrap Corporation	425 West 152nd Street, East Chicago 46312
Inland Detroit Diesel Allison	2601 East 15th Avenue, Gary 46401
Metal Recovery Industries, Inc.	415 E. 151st Street, East Chicago

TABLE 1-2 (Continued)

LIST OF FACILITY ADDRESSES

Facility Name	Facility Address
Methodist Hospital-Northlake	600 Grant Street, Gary 464020
Mid-Continental Coke Company	370 North Clark Road, Gary
Mid-West Flame Hardening	500 West 150th Street, East Chicago
Miller and Company	1225 Martin Luther King Drive, Gary
National Processing Corp.	Not available
National Recovery Systems	5222 Indianapolis Boulevard, East Chicago 46312
NEO Industries, Inc.	201 Mississippi Street, Gary 46401
Northern Indiana Dock	3601 Canal Street, East Chicago
Northern Indiana Public Service Company Dean H. Mitchell Generating Station	5265 Hohman Avenue, Hammond 46320-1775 (Corporate headquarters)
Northwest Family Hospital	501 Family Plaza, Gary 46402
Northwest Indiana Water Company	650 Madison Street, Gary 46403
Phillips Petroleum Corporation	400 East Columbus, East Chicago 46312
Praxair, Inc.	4400 Kennedy Avenue, East Chicago 46312, and Clark and Dean Mitchell Roads, Gary, Indiana
Ralston Street Lagoon, Gary Sanitary District	3600 West 3rd Avenue, Gary 46402
Republic Engineered Steels, Inc.	400 East 7th Avenue, Gary 46403, and 2800 East Dunes Highway in Gary, Indiana
Robinson Steel	4303 Kennedy Avenue, East Chicago 46312
Roll Center, Inc.	218 Mississippi Street, Gary 46402
Rubber Material Handling, Inc.	4407 Railroad Avenue, East Chicago 46312
Safety-Kleen Oil Recovery Company	601 Riley Road, East Chicago 46312
Samocki Brothers Trucking Company	5030 Industrial Highway, Gary 46404
Shell Oil Company	2400 Michigan Street, Hammond
Shell Oil Company Gasoline Stations	Gas Station No. 1 - 4601 West 5th Avenue, Gary 46404 Gas Station No. 2 - 3501 Broadway, Gary 46408 and Gas Stations: - 5390 15th Street, Gary 46404 - 4890 Broadway, Gary - 4492 Cleveland Street, Gary 46408 - 3499 Grant Street, Gary - 2100 East Columbus Drive, East Chicago - 4804 Indianapolis Boulevard, East Chicago
St. Mary Medical Center	501 Family Plaza, Gary 46402
Tri State Coach Lines, Inc.	2101 West 37th Avenue, Gary 46408
Truckstops of America, Inc.	2510 Burr Street, Gary
Union Tank Car Company	300 West 151st Street, East Chicago 46312
United Rail Services	1150 East 141st Street, East Chicago 46312

TABLE 1-2 (Continued)

LIST OF FACILITY ADDRESSES

Facility Name	Facility Address
United States Gypsum Company	3501 Canal Street, East Chicago
United States Reduction Company	4610 Kennedy Avenue, East Chicago
Viking Engineering Company, Inc.	2300 Michigan Street, Hammond and 175 West Chicago Avenue, East Chicago
Willet Trucking	3333 Sheffield Avenue, Hammond 46312

Note: All addresses listed above are in Indiana and were obtained from the facility files.

TABLE 1-3

**26 FACILITIES WITH NO DOCUMENTS OR
WHOSE DOCUMENTS WERE NOT PHOTOCOPIED**

Facility Name	File Room		
	Environmental Response ^a	Solid and Hazardous Waste Management ^b	Water Management ^c
A Metz, Inc.	No documents photocopied ^d	No documents ^e	No documents
American Terminal	No documents	No documents	No documents
Anderson Trucking Inc.	No documents	No documents	No documents
Atlas Iron Processors Inc.	No documents	No documents photocopied	No documents
Blaw Knox Foundry	No documents photocopied	No documents photocopied	No documents photocopied
Calumet Lumber	No documents	No documents	No documents photocopied
Certified Concrete	No documents	No documents	No documents
Dorum Hair Care Inc.	No documents	No documents	No documents
East Chicago Central Services	No documents	No documents	No documents
East Chicago Incinerator	No documents	No documents	No documents
Granulation Services: East Chicago Enterprise Center	No documents	No documents	No documents
Halstab Lead Products	No documents	No documents	No documents
Hy-Speed Car Wash	No documents	No documents	No documents
I/M Steel	No documents	No documents	No documents
Illiana Steel Inc.: East Chicago Enterprise Center	No documents	No documents	No documents
Indiana Radiator Shop, Inc.	No documents	No documents photocopied	No documents
Industrial Steel Construction	No documents	No documents	No documents
Jernberg Ind.: East Chicago Enterprise Center	No documents	No documents	No documents
Joyce Sportswear	No documents	No documents	No documents
Marport Smelting	No documents	No documents photocopied	No documents
Meca Industries	No documents	No documents	No documents
Midwest Steel Treating	No documents	No documents	No documents
Pallet Company	No documents	No documents	No documents
Perry Maintenance & Trucking	No documents	No documents	No documents
Service Waste	No documents	No documents photocopied	No documents
Superior Beverage Co., Inc.	No documents photocopied	No documents	No documents

Notes:

- ^a All documents available for each facility were reviewed.
- ^b All documents available for each facility were reviewed.
- ^c All documents available for each facility and dated 1994 to the present were reviewed.
- ^d Documents were available but were not photocopied because they were not pertinent to the PRP search.
- ^e Documents were not available.

2.0 FACILITY SUMMARIES

This section summarizes the pertinent information found in the documents photocopied during the file search at the three IDEM file rooms. Each summary subsection below contains information on one of the 62 facilities and discusses (1) the facility location; (2) pertinent information in documents photocopied in the Environmental Response, Solid and Hazardous Waste Management, and Water Management file rooms; and (3) any other possible PRPs identified during the document review. For each facility, the pertinent information is presented according to the file room or rooms from which it was obtained. The facility summary subsections are arranged alphabetically by PRP name.

For each of the 62 facilities, one PRP's name is primarily associated with the facility, and the facility is referred to by this name. In many cases, the current or most recent facility operator's name is used to refer to the facility. For the purposes of this report, the term "facility" refers to a specific physical location. Depending on each entity's corporate or business history and each facility's operational history, more than one PRP may be associated with a particular facility location. If Tetra Tech identified information concerning PRPs other than the namesake PRP within a facility document, these other parties are discussed in the facility summary within the "Other Possible PRPs" subsection. In some cases, such as that of Shell Gas Station, the list provided by IDEM identifies only one facility name but, during the file search, Tetra Tech found documents pertaining to several locations associated with the facility name. In each such case, the facility summary includes pertinent information on each location associated with the facility name.

Generally, the summaries provided in this section include only the information available in the facility documents found in the three file rooms (see Table 1-1). Therefore, the level of detail provided for some facilities is greater than that provided for others. For example, if a spill at a facility is indicated in a document, other facility documents reviewed may or may not have information on whether the spill was cleaned up. Under the current scope of work established by IDEM, Tetra Tech has not conducted additional investigative work to eliminate data gaps or resolve inconsistencies.

Finally, the information provided in the summaries is referenced using document control numbers (DCN). Each DCN cited is the date stamp number on the first page of the document copy or stapled set of document copies from which the information was obtained. The single general reference cited in this section is the document titled "Draft: Potentially Responsible Parties for Grand Calumet River/Indiana Harbor Ship Canal (GCR/IHSC) Contaminated Sediments" (IDEM 1996), which was provided to Tetra Tech by IDEM.

2.1 AMERICAN JUICE INC.

American Juice Inc. (American Juice) is a canning company. The American Juice facility produces soda pop by mixing corn syrup with flavored and carbonated water. Also, juice products are made by mixing concentrate and water; the juices are then pasteurized and packaged (DCN 052160). American Juice changed its name to Select Enterprises, L.L.C., and then, in February 1996, to Select-Canfield Enterprises LLC (DCN 052155).

2.1.1 Facility Location

The American Juice facility is located at One North Bridge Street in Gary, Indiana (DCN 052149). This facility is located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996).

2.1.2 Summary of Pertinent Information

The pertinent information presented below on the American Juice facility was drawn from documents in the Environmental Response and Water Management file rooms.

Environmental Response File Room

The American Juice facility had eight underground storage tanks (UST) that were removed on June 21, 1990. A leaking UST initial incident report log indicates that no soil contamination was present at the time of the tanks' removal. Also, the report log states that water was not encountered during the removal (DCN 052151).

On July 15, 1992, a valve came off a tank and 250 pounds of anhydrous ammonia gas was released into the air in a facility building. The building was allowed to vent for about 3 hours before workers were allowed to return. According to the initial incident report log, water was not involved in the release of the anhydrous ammonia gas (DCN 052149).

Solid and Hazardous Waste Management File Room

No documents for the American Juice facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

The American Juice facility is a significant industrial user discharging wastewater to the Gary Sanitary District (GSD) treatment plant (DCN 052160). American Juice was issued letters of violation by GSD in 1992 for high chemical oxygen demand (COD) and biochemical oxygen demand (BOD) in facility wastewater (IDEM 1996). Tetra Tech found no information related to this matter in the files, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in the Water Management file room.

In the 1994 GSD annual report, the American Juice facility is listed in the category of significant noncompliance industrial user for failure to provide self-monitoring data within 30 days of the due date and for oil and grease violations (DCN 052160). In 1995, GSD issued American Juice a final order for failure to produce data concerning flows and loadings at the facility. The order required American Juice to install a GSD-approved control manhole and flow monitoring devices at specific GSD locations (DCN 052156).

2.1.3 Other Possible PRPs

GSD, Select Enterprises, L.L.C., and Select-Canfield Enterprises LLC were identified as other possible PRPs for the AOA during Tetra Tech's review of the American Juice facility files. Select Enterprises, L.L.C. and Select-Canfield Enterprises LLC were former names of the facility (DCN 052155). Select Enterprises, L.L.C. and Select-Canfield Enterprises LLC are newly identified possible PRPs. The American Juice facility discharges its wastewater to the GSD treatment plant (DCN 052160). A summary of the information in the document copies pertinent to GSD is provided in Section 2.23.

2.2 AMERICAN STEEL FOUNDRIES

American Steel Foundries (American Steel) has two facilities in northern Indiana. The facility in East Chicago manufactures steel castings for the railroad industry. Also, the facility manufactures fifth wheels for truck trailers (DCN 052178). No information on operations at the American Steel facility in Hammond was available in the documents reviewed by Tetra Tech.

2.2.1 Facility Location

As stated above, American Steel has operated at two locations in northern Indiana. One American Steel facility is located at 3761 Canal Street in East Chicago (DCN 052167). The second American Steel facility is located at 4831 Hohman Avenue in Hammond (DCN 052171). The document titled "Draft: Potentially Responsible Parties for Grand Calumet River/ Indiana Harbor Ship Canal (GCR/IHSC) Contaminated Sediments" indicates that an American Steel facility is an industrial discharger to East Chicago Sanitary District (ECSD), which is located in Priority Reach E, the fork of the East-West Branch of the Ship Canal to the west end of Roxana Marsh (IDEM 1996). The address of the facility that discharges to ECSD in Priority Reach E is not currently available to Tetra Tech. Because of the uncertainty regarding which facility discharges to ECSD, Tetra Tech summarizes information pertinent to both facilities below.

2.2.2 Summary of Pertinent Information

The pertinent information presented below on the American Steel facilities was drawn from documents in the Environmental Response, Solid and Hazardous Waste Management, and Water Management file rooms. At IDEM's direction, Tetra Tech reviewed only files dated 1994 to present in the Water Management file room; however, Tetra Tech observed documents dated earlier than 1994 in the American Steel facility files in this file room.

Environmental Response File Room

As described below, spills have occurred at the American Steel facilities in Hammond and East Chicago, Indiana.

On March 2, 1990, 30 gallons of fuel oil spilled from a tank at the American Steel facility in Hammond. The spilled fuel oil covered about 15 square feet in the tank area. Free liquid was recovered, and sand was applied to the spill area (DCN 052171).

On December 16, 1992, 300 gallons of quench oil overflowed from a tank at the American Steel facility in Hammond. The spilled quench oil covered about 300 square feet in the tank area. According to an initial incident report, American Steel was going to correct the problem with the tank and clean up the spilled quench oil (DCN 052169).

On February 12, 1998, a spill from a UST was reported at the American Steel facility in East Chicago during closure of two 4,000-gallon diesel USTs. Affected media included both backfill and natural soils. Also, during the UST removal, a sewer line was ruptured (DCN 052167).

Solid and Hazardous Waste Management File Room

The American Steel document copies from the Solid and Hazardous Waste Management file room pertained to the facility in East Chicago, Indiana

Manufacturing operations at the American Steel facility include melting steel scrap, casting the melted steel, and grinding and painting the casts. Hazardous waste streams generated include waste paint and resin (DCN 052178).

In December 1990, the IDEM Office of Solid and Hazardous Waste Management gave American Steel a special waste disposal approval to dispose of 100 cubic yards of resin-contaminated soil excavated during a UST removal (DCN 052186).

On April 25, 1996, IDEM conducted an inspection at the American Steel facility. IDEM found used oil spilled in a waste drum storage area and in a compressor room or powerhouse area. Also, IDEM found aluminum enamel dip spilled in an empty drum storage area (DCN 052181). During a reinspection conducted on September 19, 1996, IDEM determined that American Steel had cleaned up the spill areas and transported contaminated material to Deercroft Landfill (DCN 052175).

Water Management File Room

On March 31, 1986, the American Steel facility in East Chicago, Indiana, was authorized to discharge wastewater to the Indiana Harbor Ship Canal in accordance with effluent limitations, monitoring requirements, and other conditions set by IDEM in National Pollutant Discharge Elimination System (NPDES) Permit No. IN0000167. According to a 1987 permit amendment, the permit was to expire on February 28, 1991 (DCN 052191).

One American Steel facility is an industrial discharger of wastewater to ECSD (IDEM 1996). The American Steel facility was in "total compliance" according to ECSD Industrial Compliance Status Reports dated March 31, 1995 (DCN 054199), July 25, 1996 (DCN 054191), April 25, 1996 (DCN 054187), April 25, 1997 (DCN 054182), July 24, 1997 (DCN 054178), and October 23, 1997 (DCN 054174).

2.2.3 Other Possible PRPs

ECSD was identified as another possible PRP for the AOA during Tetra Tech's review of the American Steel facility files (IDEM 1996; DCN 054199). One American Steel facility discharges its wastewater to ECSD; however, Tetra Tech could not obtain the address of this facility. A summary of the information in the document copies pertinent to ECSD is provided in Section 2.16.

2.3 AMG RESOURCES CORPORATION

The AMG Resources Corporation (AMG) facility recycles tin-plated steel. Tin is stripped and concentrated for resale; the remaining steel is sold to local steel mills. The facility was owned and operated by Vulcan Materials Company (Vulcan) until 1988 (DCN 054201 and DCN 054223).

2.3.1 Facility Location

The AMG facility is located at 459 North Cline Avenue in Gary, Indiana (DCN 054209). The facility is located directly north of the Grand Calumet River (DCN 054201) in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996).

2.3.2 Summary of Pertinent Information

The pertinent information presented below on the AMG facility was drawn from documents in the Solid and Hazardous Waste Management file room.

Environmental Response File Room

No pertinent documents for the AMG facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

A May 20, 1977, letter from the Indiana State Board of Health (ISBH) to Vulcan and a May 24, 1977, ISBH office memorandum both note that leachate seeping from an unlined facility lagoon was entering the neighboring Gary Development Landfill property and that Gary Development Landfill was subsequently discharging leachate to the Grand Calumet River. Leachate discharged from the facility to Gary Development Landfill contained high levels of cyanide and arsenic. In addition, this leachate exhibited high pH levels. Vulcan used the facility lagoon for storage of detinning and wastewater sludge (DCN 054219 and DCN 054221).

In January and March 1980, U.S. Environmental Protection Agency (EPA) conducted hazardous waste site investigations at the AMG facility. The facility was operated by Vulcan at the time of the inspection. The investigations revealed the following (DCN 054212):

- The steady flow of leachate into Gary Development Landfill's borrow pit was either purposely or inadvertently generated from operations at the facility. The leachate was observed and sampled on March 27, 1980.
- Concentrations of 4-nitrophenol and tetrachloroethylene in samples collected from the facility's lined lagoon were 240 and 78 micrograms per liter ($\mu\text{g/L}$), respectively.
- Samples collected from the facility's leachate discharge to Gary Development Landfill contained 40 and 12 $\mu\text{g/L}$ of phenol and 1,227 $\mu\text{g/L}$ of 1,2-dichloroethane.
- Larry Hagen, Gary Development Landfill manager, stated that he believed that the facility injected waste liquid into the ground. He observed waste effluent being discharged directly into the Grand Calumet River from a pipe just south of the facility property.

An EPA letter to the ISBH dated July 20, 1982, identifies the following chronology of EPA's involvement with the AMG facility (DCN 054210):

- ~~April 1977: ISBH issued orders that Vulcan address its lagoon problems. A lined lagoon was subsequently constructed.~~

- December 1979: EPA received complaints that Vulcan was contaminating soils, groundwater, and the Grand Calumet River with caustic wastewater from its metal detinning operations.
- March 1980: EPA staff visited Gary Development Landfill and the facility to collect samples. EPA found leachate bubbling out of the west embankment at a rate of 5 to 10 gallons per minute. EPA staff suspected Vulcan might be injecting corrosive process wastes into facility soils.
- July 1980: EPA staff inspected the facility for possible enforcement violations. EPA's basic concerns included groundwater contamination and surface water runoff into the Grand Calumet River. Contaminants of concern included tin, heavy metals, caustic water, and lacquer residues.

In December 1980, EPA negotiated an agreed order with Vulcan that required Vulcan to sample storm sewer effluent, lagoons, and soils; undertake any necessary remedial action; apply for an NPDES permit; and stop using the unlined lagoon (DCN 054201 and DCN 054210).

In 1984, an EPA field investigation team contractor investigated the facility as a potential Superfund site. In 1987, IDEM requested that the facility be recommended for inclusion in the next update of the National Priorities List (DCN 054201).

In a March 15, 1988, letter from AMG, IDEM was notified that AMG was the new owner of the facility (EPA ID No. IND 005 444 732) located at 459 North Cline Avenue in Gary, Indiana (DCN 054209).

Water Management File Room

The AMG facility has one NPDES-permitted discharge to the Grand Calumet River. This discharge consists of wastewater generated from noncontact cooling, boiler blowdown, water softener regeneration, and parking area runoff. In 1995, the facility had NPDES discharge exceedances involving oil and grease (IDEM 1996). Tetra Tech found no documents discussing these exceedances in the Water Management file room, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in this file room.

2.3.3 Other Possible PRPs

Gary Development Landfill and Vulcan were identified as other possible PRPs for the AOA during Tetra Tech's review of the AMG facility files (DCN 054219 and DCN 054221). A summary of the information in the document copies pertinent to Gary Development Landfill is provided in Section 2.20. The AMG facility was owned and operated by Vulcan until 1988 (DCN 054201). Vulcan is a newly identified PRP.

2.4 ANDERSON DEVELOPMENT COMPANY

The Anderson Development Company (Anderson Development) facility is a chemical manufacturing plant that produces intermediate products for the rubber and toner resin industry (DCN 052252). The facility began operation in July 1974 (DCN 052196).

2.4.1 Facility Location

The Anderson Development facility is located at 3400 West Fourth Avenue in Gary, Indiana. The facility is located about 500 feet south of the Grand Calumet River and covers about 9 acres (DCN 052196). This facility is located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996).

2.4.2 Summary of Pertinent Information

The pertinent information presented below on the Anderson Development facility was drawn from documents in the Environmental Response and Water Management file rooms.

Environmental Response File Room

The Anderson Development facility is a chemical manufacturing plant that performs polymerization, coagulation, and drying of resins. The facility is a listed hazardous waste generator and a storer of phosgene, pentachlorophenol, hydrazine, methanol, tetrahydrofuran, and toluene (DCN 052213).

Two explosions occurred at the Anderson Development facility on November 5, 1981. The initial explosion was caused by lack of cooling water in a reactor as a result of a transformer malfunction at the plant. The reactor contained an experimental insecticide produced in a three-stage reaction using tetrahydrofuran, magnesium, ethyl bromide, parachlorobenzo trifluoride, and benzaldehyde. The second explosion occurred when water being used to extinguish a fire caused by the first explosion reacted with the magnesium turnings used in the reaction process (DCN 052208). After the explosions, the basement of the facility was filled with about 8 feet of water (DCN 052216). Three samples of the water collected by a representative of the ISBH had high concentrations of tetrahydrofuran. Other possible contaminants in the water included toluene, methyl benzene, ethyl bromide, and parachlorotrelouro (DCN 052248). The basement was used for storage of drums containing tetrahydrofuran prior to the explosions (DCN 052244). The contaminated water was removed and taken to the Calumet Industrial Disposal (CID) landfill (DCN 052249).

In 1986, Anderson Development obtained Illinois Environmental Protection Agency (IEPA) Permit No. 831384 as a special waste generator and IEPA approval to dispose of butadiene polymer waste at the CID landfill (DCN 052196).

During a site inspection conducted by Ecology and Environment, Inc. (E&E), on September 4, 1986, four soil samples were collected near feedstock intakes and aboveground tanks. Concentrations of organic and inorganic chemicals were detected at substantially higher levels in the on-site samples than in a background sample. In addition, the on-site soil samples had high concentrations of styrene, and styrene had been spilled on the ground near the styrene intake. Also, an area of ground tainted with an unidentified yellow powder was observed during the inspection (DCN 052200).

The soil surrounding the Anderson Development facility contains highly permeable sands. According to the E&E site inspection report, some dug or drilled wells are allegedly screened in the shallow, unconsolidated sands. Most wells in this area are industrial wells that extend into bedrock. Shallow groundwater discharges to the Grand Calumet River north of the facility. A wastewater treatment plant is located 2,000 feet northwest of the facility (DCN 052200).

On June 4, 1991, E&E conducted a reconnaissance inspection at the Anderson Development facility. During the inspection, a rusted tank and four rusted drums were found, and two large tanks were observed to be wet because of leakage. Overall, 19 tanks were found, three of which contained sulfuric acid, butadiene, and styrene. Records reviewed indicated that hazardous wastes were removed from the facility from September 1978 to March 1988 (DCN 052196).

Solid and Hazardous Waste Management File Room

No documents for the Anderson Development facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

In May 1992, a reconnaissance inspection was conducted at the Anderson Development facility by the EPA Water Compliance Section. The following information was found in the inspection notes (DCN 052261):

- Anderson Development is subject to the categorical pretreatment standards for organic chemicals, plastics, and synthetic fibers.
- Anderson Development's noncontact cooling water is discharged directly to GSD, and all other wastewater is directed to Anderson Development's treatment system.
- From February 1991 to March 1992, Anderson Development exceeded its total suspended solid (TSS) and COD permit limits. GSD sent notices of violation to the facility for these exceedances.
- A July 1991 GSD inspection report indicates that Anderson Development's sewer emitted a strong odor and that its contents were milky or cloudy in appearance.

Anderson Development was cited for significant noncompliance in 1993 by GSD (IDEM 1996). Tetra Tech found no information related to this incident in the files, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in the Water Management file room.

The Anderson Development facility is a significant industrial discharger of wastewater to the GSD treatment plant. In the 1994 GSD annual report, the Anderson Development facility is listed in the category of minor noncompliance industrial user. Minor noncompliance users include industrial facilities that were out of compliance at least one or two times during the 1994 reporting period (DCN 052252).

2.4.3 Other Possible PRPs

GSD was identified as another possible PRP for the AOA during Tetra Tech's review of the Anderson Development facility files. The Anderson Development facility is a significant industrial discharger of wastewater to the GSD treatment plant (DCN 052252). A summary of the information in the document copies pertinent to GSD is provided in Section 2.23.

2.5 ASK SHREDDERS INC.

The operations conducted at the ASK Shredders Inc. (ASK Shredders) facility are not identified in the documents photocopied for the PRP search. According to an initial incident report log dated August 1990, the facility name is ASK Shredders (DCN 052266). However, an IDEM memorandum dated June 1995 refers to the facility as Metal Recovery Industries, Inc. (MRI)/ASK Shredders (DCN 052271). Tetra Tech found no documents that indicated when the ASK Shredders facility changed its name or ownership to MRI.

2.5.1 Facility Location

The ASK Shredders facility is located at 415 East 151st Street in East Chicago, Indiana (DCN 052266). This facility is located in Priority Reach D, Kennedy Avenue to 151st Street (IDEM 1996).

2.5.2 Summary of Pertinent Information

The pertinent information presented below on the ASK Shredders facility was drawn from documents in the Environmental Response and Solid and Hazardous Waste Management file rooms.

Environmental Response File Room

On August 18, 1990, 500 gallons of chromic acid rinse water was spilled at the ASK Shredders facility. The chromic acid rinse water leaked from two 12,000-gallon aboveground tanks sold to ASK Shredders by LTV Steel Company (LTV Steel). According to the initial incident report log, there was no water quality violation (DCN 052266).

Solid and Hazardous Waste Management File Room

On May 26, 1995, IDEM conducted a site inspection at the ASK Shredders facility. Following are some of the observations made during the inspection (DCN 052268):

- Thousands of waste tires being stored outdoors and uncovered
- Dumping at various locations on the facility property and within the waste tire piles
- 15,000-gallon aboveground storage tanks (AST) containing sodium hydroxide
- Leaking sodium hydroxide inside and outside the tank containment area

~~• Solidified sodium hydroxide on the ground as the result of an undetected release~~

- A leaking UST and pools of fuel on the ground surface
- Contaminated surface water runoff flowing in close proximity to the Indiana Harbor Ship Canal
- Several 55-gallon drums without labels on site

According to the site inspection report, Lake County property records indicate that since the facility property was purchased sometime in the 1980s (the date is largely illegible in the document copy), no money has been paid for outstanding property taxes (DCN 052268).

An IDEM office memorandum dated June 29, 1995, discusses the May 26, 1995, site inspection and mentions the following (DCN 052271):

- About 10,000 gallons of spent sodium hydroxide and zinc solution (D002) spilled on the floor in the process area (a spill incident number was issued)
- Seven drums of unidentified waste in the former detinning building

Water Management File Room

No documents for the ASK Shredders facility were found in the Water Management file room, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in this file room.

2.5.3 Other Possible PRPs

MRI and LTV Steel were identified as other possible PRPs for the AOA during Tetra Tech's review of the ASK Shredders facility files (DCN 052266). MRI is the most current name used to refer to the ASK Shredders facility, but the relationship between MRI and ASK Shredders is not described in the documents photocopied. LTV Steel sold two 12,000-gallon tanks to ASK Shredders that released 500 gallons of chromic acid rinse water. MRI and LTV Steel are both identified on the list of 100 facilities provided to Tetra Tech by IDEM (IDEM 1996). IDEM has already issued an PRP notice letter to LTV Steel (IDEM 1996). A summary of the information in the document copies pertinent to MRI is provided in Section 2.31.

2.6 BEAVER OIL CO., INC.

The Beaver Oil Co., Inc. (Beaver Oil), facility recovers petroleum, mineral, and synthetic oils from used metal working coolants and other metal working oils; the recovered oils are then refined into base stock (DCN 052301). The most recent documents in the files reviewed indicate that the facility is currently occupied by Beaver Oil (DCN 052292). Documents dated 1987 indicate that the facility was previously occupied by Montgomery Tank Lines and Gary Products, Inc. (DCN 052272).

2.6.1 Facility Location

The Beaver Oil facility is located at 1040 Michigan Street in Gary, Indiana (DCN 052295). This facility is an industrial discharger to GSD located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996).

2.6.2 Summary of Pertinent Information

The pertinent information presented below on the Beaver Oil facility was drawn from documents in the Environmental Response, Solid and Hazardous Waste Management, and Water Management file rooms.

Environmental Response File Room

On April 14, 1987, about 30,000 gallons of 37 percent hydrochloric acid was released to the ground at the facility. At the time of the spill, the facility was occupied by Montgomery Tank Lines and Gary Products, Inc. The release was caused by failed pipe flanges on two storage tanks. According to an IDEM memorandum dated July 7, 1987, the hydrochloric acid migrated and contaminated nearby surface waters, city storm sewers, and groundwater. The release also created a vapor cloud that required evacuation of about 2,000 area residents. Reagent Chemical and Research, Inc., owner of the acid product, had the free surface liquid removed and neutralized contaminated sediments in an abandoned clarifier tank. The clarifier tank received surface runoff and storm water drainage from the leaking storage tank area and in turn discharged effluent into the city sewer system. The pH of the liquid in the sewers was between 0 and 1. The cleanup of the surface contamination was completed by mid-April 1987 (DCN 052272).

According to the IDEM memorandum, Montgomery Tank Lines and Gary Products, Inc., were required to remove and neutralize the contaminated soils and to investigate the extent of groundwater contamination. On May 6, 1987, an investigation by the PRPs' contractor, SET Environmental, Inc., revealed that the acid had leached through the soil and was not detectable in the groundwater. Soil samples had pH values in the neutral range. Therefore, according to the IDEM memorandum, no further cleanup was required (DCN 052272).

Enforcement action against Montgomery Tank Lines and Gary Products, Inc., was recommended by IDEM because the spill was not reported to IDEM. In addition, the spill was not discovered for 1 full day; it was not cleaned up immediately; and Montgomery Tank Lines and Gary Products, Inc., did not notify the downstream sewage treatment plant. According to the IDEM memorandum, felony indictments were filed in court in July 1987 for the acid spill incident and other violations (DCN 052272).

The facility lies within 2 miles of Lake Michigan. The surrounding area is marshy, and in May 1987, the water table was 2 feet below ground surface (bgs). Natural soils in the area consist of sand. The facility property slopes to the south from the storage tank area toward two ponds of water. The direction of groundwater flow beneath the facility is unknown. The area where the spill occurred is covered with asphalt (DCN 052280).

Solid and Hazardous Waste Management File Room

According to an IDEM hazardous waste generator status certification form dated May 1994, the Beaver Oil facility is a conditionally exempt small quantity generator (DCN 052295). The facility was previously a small-quantity generator (DCN 052295).

Water Management File Room

The Beaver Oil facility discharges its wastewater to the GSD treatment plant. According to the GSD 1994 Annual Report, the Beaver Oil facility was put under the category of minor noncompliance. Minor noncompliance indicates the facility was out of compliance, at a minimum, one or two times during the 1994 reporting period (DCN 054226).

An undated project design summary for a "Waste Water Phase 1 Modification Project" prepared by Environment, Inc., indicates that oil and water waste streams from the Beaver Oil facility are discharged to the GSD treatment plant via the city sewer system and then to the Grand Calumet River, the Indiana Harbor Ship Canal, and Lake Michigan. The facility has been assigned Industrial Waste Discharge No. 59309N by GSD (DCN 052301).

2.6.3 Other Possible PRPs

Other possible PRPs for the AOA identified in the Beaver Oil facility files are summarized in Table 2-1. Gary Products, Inc.; Montgomery Tank Lines; and Reagent Chemical and Research, Inc., are newly identified possible PRPs. A summary of the information in the document copies pertinent to GSD is provided in Section 2.23.

TABLE 2-1

OTHER POSSIBLE PRPs ASSOCIATED WITH BEAVER OIL FACILITY

Possible PRP	Pertinent Information
Gary Products, Inc.	Former facility operator (as of April 14, 1987, Gary Products, Inc., leased facility property) (DCN 052272)
GSD	Operator of treatment plant that receives facility wastewater (DCN 052301 and DCN 054226)
Montgomery Tank Lines	Former facility operator (prior to 1991) (DCN 052272)
Reagent Chemical and Research, Inc.	Owner of acid product spilled on April 14, 1987 (DCN 052272)

2.7 CENTRAL STATES MARKETING

The operations conducted at the Central States Marketing facility are not identified in the documents photocopied for the PRP search.

2.7.1 Facility Location

The Central States Marketing facility is located in Priority Reach D, Kennedy Avenue to 151st Street. Also, this facility is an industrial discharger to ECSD, which is located in Priority Reach E, the fork of the East-West Branch of the Indiana Harbor Ship Canal to the west end of Roxana Marsh (IDEM 1996).

The location of the Central States Marketing facility is not identified in the documents photocopied for the PRP search.

2.7.2 Summary of Pertinent Information

The pertinent information presented below on the Central States Marketing facility was drawn from documents in the ECSD file in the Water Management file room.

Environmental Response File Room

No documents for the Central States Marketing facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

No documents for the Central States Marketing facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

The Central States Marketing facility is an industrial discharger of wastewater to the ECSD treatment plant. The Central States Marketing facility was in total compliance according to ECSD industrial compliance status reports dated March 31, 1995 (DCN 054257); April 25, 1996 (DCN 054249); July 25, 1996 (DCN 054253); January 23, 1997 (DCN 054245); April 25, 1997 (DCN 054240); July 24, 1997 (DCN 054236); and October 23, 1997 (DCN 054232).

2.7.3 Other Possible PRPs

ECSD was identified as another possible PRP for the AOA during Tetra Tech's review of the Central States Marketing facility files (DCN 054257). A summary of the information in the document copies pertinent to ECSD is provided in Section 2.16.

2.8 CHASE STREET INDUSTRIAL CENTER

The Chase Street Industrial Center facility is an industrial complex with four tenants: International Knife and Saw, Inc.; Kenwood Steel Processing, Inc.; Tinplate Partners International, Inc.; and Chicago Steel Limited, Inc. (Chicago Steel) (DCN 052313).

2.8.1 Facility Location

The Chase Street Industrial Center facility is located at 700 Chase Street in Gary, Indiana (DCN 053209). This facility is an industrial discharger to GSD located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996). The facility is referred to as Chase Street Partners in the document titled "Draft: Potentially Responsible Parties for Grand Calumet River/ Indiana Harbor Ship Canal (GCR/IHSC) Contaminated Sediments" (IDEM 1996).

2.8.2 Summary of Pertinent Information

The pertinent information presented below on the Chase Street Industrial Center facility was drawn from documents in the Water Management file room.

Environmental Response File Room

No documents for the Chase Street Industrial Center facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

No documents for the Chase Street Industrial Center facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

In February 1995, a cease and desist order and an administrative show cause hearing order (the orders) were issued in the matter of the Chase Street Industrial Center. Findings in the orders state that the Chase Street Industrial Center facility discharges process wastewaters, sludges, and sediments to the GSD treatment plant. Three of the tenants are classified as industrial users by GSD: International Knife and Saw, Inc.; Kenwood Steel Processing, Inc.; and Tinplate Partners International, Inc. The fourth tenant, Chicago Steel, is classified as a significant industrial user by GSD (DCN 052313).

As a result of inspections and sampling conducted at the facility by GSD in September and November 1994, the polychlorinated biphenyls (PCB) Aroclor 1248 and 1254 were detected in an electrical transformer area and within a storm sewer serving the northeast end of the facility. Also, the PCBs Aroclor 1242, 1248, and 1254 were found in 17 different locations throughout the Chicago Steel portion of the facility (DCN 052313).

On March 28, 1995, a show cause hearing for the Chase Street Industrial Center was held at GSD. The hearing was a condition of the February 1995 orders. The hearing findings include the following information (DCN 052309):

- PCBs have been detected in discharges from the Chase Street Industrial Center facility.
- A cease and desist order dated February 10, 1995, required discontinuation of PCB-contaminated discharges.
- As of the sampling date of March 23, 1995, the facility was still discharging PCB-contaminated material to the GSD treatment plant.
- GSD incurred a large cost in detecting, handling, and disposing of PCB-contaminated material at the facility.

As a result of the hearing, the Chase Street Industrial Center facility was ordered to complete the following tasks within 6 months after the order date, February 10, 1995 (DCN 052309).

- Plug all wastewater and storm water discharge points associated with the Chase Street Industrial Center facility by April 20, 1995
- Pay \$2 million to GSD for costs incurred
- Remediate all PCB-contaminated water collection facilities along the route by which wastewater and storm water travel from the Chase Street Industrial Center facility to the GSD treatment plant
- Remediate the PCBs in the GSD water collection system

2.8.3 Other Possible PRPs

Other possible PRPs for the AOA identified in the Chase Street Industrial Center facility files are summarized in Table 2-2. International Knife and Saw, Inc.; Kenwood Steel Processing, Inc.; and Tinplate Partners International, Inc., are newly identified possible PRPs. A summary of the information in the document copies pertinent to Chicago Steel is provided in Section 2.10. A summary of the information in the document copies pertinent to GSD is provided in Section 2.23.

TABLE 2-2
OTHER POSSIBLE PRPs ASSOCIATED WITH
CHASE STREET INDUSTRIAL CENTER FACILITY

Possible PRP	Pertinent Information
Chicago Steel	Tenant of the Chase Street Industrial Center facility (DCN 052313)
GSD	Operator of treatment plant that receives facility wastewater (DCN 052309)
International Knife and Saw, Inc.	Tenant of the Chase Street Industrial Center facility (DCN 052313)
Kenwood Steel Processing, Inc.	Tenant of the Chase Street Industrial Center facility (DCN 052313)
Tinplate Partners International, Inc.	Tenant of the Chase Street Industrial Center facility (DCN 052313)

2.9 CHICAGO FLAME HARDENING

The Chicago Flame Hardening (Chicago Flame) facility conducts surface hardening, bulk welding, stress relieving, and mechanical straightening operations (DCN 052326).

2.9.1 Facility Location

The Chicago Flame facility is located at 5200 Railroad Avenue in East Chicago, Indiana (DCN 052326). According to a 1986 inspection report, Union Carbide occupied this facility prior to Chicago Flame (DCN 052326). This facility is located in Priority Reach E, the Fork of the East-West Branch of the Ship Canal to the west end of Roxana Marsh (IDEM 1996).

2.9.2 Summary of Pertinent Information

The pertinent information presented below on the Chicago Flame facility was drawn from documents in the Solid and Hazardous Waste Management file room.

Environmental Response File Room

No pertinent documents regarding the Chicago Flame facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

On May 28, 1986, Green Peace sent a letter to IDEM concerning a visit that Green Peace had made to the Chicago Flame facility. According to the letter, process waste was discharged from a pipe in the back of the facility. Underneath the pipe, the waste had accumulated to a thickness of 18 to 24 inches. The discharged waste appeared to be in solution or slurry form and spilled off the east edge of a hilltop into a wash running north toward Railroad Avenue (DCN 052324).

On July 17, 1986, a complaint inspection was conducted at the Chicago Flame facility by IDEM's Compliance Monitoring Section. According to the inspection file notes, calcium carbide was mixed with water and the resulting gas was used as fuel for flame hardening at the facility. When all the gas was spent, the remaining lime slurry was pumped into a lime pit. During the inspection, Chicago Flame stated that two-thirds of the waste lime pit "belongs" to the "City Water Department" and Chicago Flame owns the other third. According to Chicago Flame, Union Carbide, the previous occupant of the facility, had generated most of the waste lime in the pit. During the inspection, IDEM noted that waste lime had washed toward railroad tracks east of the pit. At the time of the inspection, Chicago Flame had not performed a waste determination for the lime material (DCN 052326).

According to a May 10, 1988, memorandum prepared by IDEM's Compliance Monitoring Section, the waste lime generated by the Chicago Flame facility is not hazardous (DCN 052321).

Water Management File Room

No documents for the Chicago Flame facility were found in the Water Management file room, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in this file room.

2.9.3 Other Possible PRPs

Union Carbide was identified as another possible PRP for the AOA during Tetra Tech's review of the Chicago Flame facility files. Union Carbide operated at the facility before Chicago Flame and reportedly generated most of the waste lime in the pit (DCN 052326). Also, the "City Water Department" was

identified as another possible PRP because it reportedly owns two-thirds of the waste lime pit at the facility (DCN 052326). Union Carbide and the "City Water Department" are newly identified possible PRPs.

2.10 CHICAGO STEEL LIMITED, INC.

The Chicago Steel facility performs steel processing of galvanized steel and tinplate. Also, the facility performs alkaline cleaning of sheet steel (DCN 052332).

2.10.1 Facility Location

The Chicago Steel facility is located at 700 Chase Street in Gary, Indiana (DCN 052332). This facility is located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996). In the files for the Chicago Steel facility, documents were also found for The Budd Company. The Budd Company had the same street address as Chicago Steel. Information in the Chase Street Industrial Center facility files (see Section 2.8) indicates that Chicago Steel is one of four firms that have operated at this address but does not mention The Budd Company (DCN 052328).

2.10.2 Summary of Pertinent Information

The pertinent information presented below on the Chicago Steel facility was drawn from documents in the Solid and Hazardous Waste Management and Water Management file rooms.

Environmental Response File Room

No documents for the Chicago Steel facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

Tetra Tech found no pertinent documents regarding Chicago Steel's operations at the facility in the Solid and Hazardous Waste Management file room. However, the facility file had pertinent information for The Budd Company, which operated at 700 Chase Street prior to 1981. In 1980, The Budd Company submitted notification to EPA as a hazardous waste generator and as a treatment, storage, or disposal (TSD) facility (EPA ID No. IND 005 110 564) (DCN 052328). In November 1985, The Budd Company requested that the facility's status be changed from that of a hazardous waste generator and TSD facility to nonregulated status. According to the November 1985 request, hazardous substance "No. U210" was used to clean tools, dies, and equipment at the facility prior to 1981, when it was replaced with a "Rule 66" solvent. The request indicates that all suspected hazardous materials were removed from the facility in spring 1981. In December 1985, EPA changed the facility's status to that of a closed, nonregulated, non-TSD installation (DCN 052328).

Water Management File Room

GSD issued letters of violation to Chicago Steel in 1992 for high COD, TSS, and oil and grease levels in facility wastewater (IDEM 1996). Tetra Tech found no information related to this matter in the files, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in the Water Management file room.

The Chicago Steel facility is a significant industrial user that discharges wastewater to the GSD treatment plant. In the 1994 GSD annual report, the Chicago Steel facility is listed in the category of significant noncompliance industrial user because of violations involving oil and grease and zinc levels in facility wastewater (DCN 052332).

2.10.3 Other Possible PRPs

GSD was identified as another possible PRP for the AOA during Tetra Tech's review of the Chicago Steel facility files. The Chicago Steel facility discharges its wastewater to the GSD treatment plant (DCN 052332). A summary of the information in the document copies pertinent to GSD is provided in Section 2.23. Another possible PRP is The Budd Company, which formerly operated at the facility. Aside from the 700 Chase Street address, document copies indicate that The Budd Company also occupied 2573 S. Rochester Road in Rochester, Michigan (DCN 052328). The Budd Company is a newly identified possible PRP.

2.11 CITGO PETROLEUM CORPORATION

The Citgo Petroleum Corporation (Citgo) terminal facility serves as a terminal for oil and fuel products used in various industries. Oil and fuel products are piped into 58 storage tanks at the facility from seven pipelines that originate on the Gulf Coast. The facility also has a truck rack used to load jet fuel. From 1929 to 1972, Cities Service Company (Cities) used the facility as a petroleum refinery. From 1974 to 1976, the refinery was dismantled, and since 1976 the facility has operated only as a petroleum product terminal. According to a 1991 preliminary assessment/visual site inspection (PA/VSI) report, in March 1983 Cities created Citgo. In September 1983, Cities sold Citgo to The Southland Corporation, which in turn sold half of Citgo's operations to Petroleos de Venezuela, South America (PDVSA). In 1990, the other half of Citgo was also sold to PDVSA. Citgo operates as an independent business entity under PDVSA's ownership (DCN 052395).

During the file search, Tetra Tech photocopied documents pertaining to the Citgo terminal facility and three Citgo service stations. All three file rooms contained documents pertinent to the Citgo terminal facility. The documents pertinent to the three Citgo service stations were found in the Environmental Response file room.

2.11.1 Facility Location

The Citgo terminal facility is located at 2500 East Chicago Avenue in East Chicago, Indiana (DCN 052395). This facility is located in Priority Reach H, Columbus Drive to the Railroad Overpass and the Lake George Branch of the Indiana Harbor Ship Canal (IDEM 1996). The Grand Calumet River is located about 1,200 feet from the facility. The three Citgo service stations are located at 4301 Cleveland Avenue in Gary, Indiana (DCN 052339); 1205 West Chicago Avenue in East Chicago, Indiana (DCN 052344); and 845 North Broad Street in Griffith, Indiana (DCN 052382).

2.11.2 Summary of Pertinent Information

The pertinent information presented below on the Citgo terminal facility was drawn from documents in the Environmental Response, Solid and Hazardous Waste Management, and Water Management file rooms. The pertinent information on the three Citgo service stations was drawn from documents in the Environmental Response file room only.

Environmental Response File Room

In September 1991, EPA sent a letter to IDEM concerning observations made during a PA/VSI conducted by Tetra Tech (at that time PRC Environmental Management, Inc.) at the Citgo terminal facility. According to the September 1991 letter, an active surface impoundment containing liquid waste and sludge was observed across the street from the facility. During the PA/VSI, Tetra Tech observed a truck dumping landscape waste into this impoundment. Citgo representatives stated that the property across the street from the facility had been sold to Lake Materials in 1975 (DCN 052381).

Table 2-3 summarizes spills that have occurred at the Citgo terminal facility.

TABLE 2-3
SPILLS AT CITGO TERMINAL FACILITY

Date of Spill	Material Spilled	Amount of Spill (Gallons)	Area Affected	Cleanup Performed	DCN ^a
09/07/79	Gasoline	13,020	Grand Calumet River at 141st and Canal Street in East Chicago, Indiana	Vacuum-pumped and placed in separator; boom placed in river	052386
09/30/91	No. 2 fuel oil	200	Tank No. 56; spill contained in a diked area	Vacuum pumped; contaminated soil excavated, placed on plastic, and covered; contaminated soil was to be tested before disposal	052379
12/18/91	No. 2 fuel oil	200	Tank No. 58; spill contained in a diked area	No information available	052377
03/01/96	Jet turbine fuel	10,000	Tank No. 18; spill contained within a secondary containment dike (22,500 square feet affected in the southwest corner of the diked area)	Vacuum-pumped; all spilled fuel recovered	052365 052363 052358
05/21/96	Turbine fuel	200	Asphalt and crushed stone surfaces	Vacuum-pumped; contaminated soil was to be excavated	052354
05/04/98 (Notification date)	Turbine fuel	100	Area of underground transfer pipeline between storage tanks; staining on ground surface	Vacuum-pumped; contaminated soil was to be excavated, tested, and disposed of	052356

Note:

^a DCN of facility document from which information was obtained

Regarding the three Citgo service stations, the documents reviewed indicate that a spill has occurred at each station. Table 2-4 summarizes the service station spill information available.

TABLE 2-4
SPILLS AT CITGO SERVICE STATIONS

Location of Service Station	Date of Spill	Material Spilled	Amount of Spill	Area Affected	DCN ^a
845 North Broad Street, Griffith, Indiana	09/10/90	Gasoline	Unknown	Subsurface soils Storm and sanitary sewers Neighbor's basement sump	052382
4301 Cleveland Avenue, Gary, Indiana (Station also referred to as Kerr McGee, and responsible party is indicated to be Jack Ronning)	Discovered during preliminary environmental investigation on 11/28/95	Gasoline	Unknown	Undetermined	052339
1205 West Chicago Avenue, East Chicago, Indiana (Station is operated by Jack Ronning of the Ronning Oil Corporation)	Discovered during preliminary environmental investigation on 07/10/96	Gasoline	Unknown	Undetermined	052344 052342

Note:

^a DCN of facility document from which information was obtained

Solid and Hazardous Waste Management File Room

On July 8 and 10, 1991, Tetra Tech (at that time PRC Environmental Management, Inc.) conducted a PA/VSI at the Citgo terminal facility. This facility operates as a large-quantity generator and storer of hazardous waste when the tanks containing oil and fuel products and a skimming tank in an oil-water separator are cleaned. The PA/VSI report identifies the following three solid waste management units (SWMU) and two areas of concern (AOC) at the facility (DCN 052395).

SWMUs

- Oil-water separator
- Former Tank No. 195 (Closure activities were conducted for this, but the PA/VSI revealed no evidence of EPA or IDEM approval of tank closure.)
- Tank No. 88

AOCs

- Former oil-saturated soil area
- Former asbestos-contaminated soil area

The PA/VSI report indicates that a high potential existed for a release of hazardous constituents to groundwater from surface soils contaminated with oil and asbestos. From 1974 to 1976, the oil-saturated soil and asbestos-contaminated soil were generated during dismantlement of the facility refinery. The PA/VSI report states that in January 1984, National Wrecking Company removed 75 cubic yards of asbestos-contaminated soil from the facility and disposed of it at the Indiana Waste Systems, Inc., landfill. A permit dated April 19, 1985, authorized Chemical Waste Management, Inc., to remove about 1,700 cubic yards of oil-saturated soil and dispose of it at the CID landfill. In addition, oily waste stored in former Tank No. 195 may have affected surrounding surface soils during dismantlement of the tank. The PA/VSI report also states that oil-water separator waste could leak into surrounding surface soils when the waste is transferred to Tank No. 88. Groundwater near the facility flows to area surface waters, including the Grand Calumet River and Lake Michigan (DCN 052395).

According to the PA/VSI report, the potential for a release of hazardous constituents to surface water is low. Water in the facility's oil-water separator originates from storm water runoff. Effluent is then discharged to the Grand Calumet River about 1,200 feet from the facility. The oil-water separator is regulated under an NPDES permit (DCN 052395).

The PA/VSI report indicates that several waste streams have been generated at the Citgo terminal facility. Wastes generated at the time of the PA/VSI consisted of low-grade fuel distillate tank bottoms, gasoline tank bottoms, oil and wastewater, and oily residue. Oil-water waste from tank bottoms was generated until about 1980 and was stored in Tank No. 195 (DCN 052395).

The PA/VSI report recommends that the areas where asbestos-contaminated soil and oil-saturated soil were removed be sampled to make sure that no pollutants remain. Also, the report recommends that soil around Tank No. 88 be sampled to make sure there are no pollutants in the soil and that groundwater in the area be monitored if soil contamination is discovered (DCN 052395).

Water Management File Room

On January 7, 1994, IDEM conducted an NPDES compliance inspection at the Citgo terminal facility. According to the inspection report, effluent discharged from outfall 001 flows to the Grand Calumet River. The primary discharge is storm water runoff from tank farms and storage areas. An oil sheen was observed in the final treatment basin at the facility. Citgo maintained that the source of the oil sheen was oil infiltration from the Grand Calumet River. IDEM suggested to Citgo that an oil boom be installed in the basin (DCN 052412).

On September 26, 1995, IDEM conducted an NPDES compliance inspection at the Citgo terminal facility. According to the inspection report, Citgo has General Permit No. ING 340009, and the facility discharges its storm water through an oil-water separator to the Grand Calumet River. During the inspection, an oil sheen was observed in the discharge basin. The report states that this oil sheen presented a concern and should be addressed (DCN 052411).

On April 25, 1996, IDEM conducted an NPDES compliance inspection at the Citgo terminal facility. According to the inspection report, Citgo sent IDEM a Notice of Intent (NOI) letter on February 21, 1995, indicating that the facility's two outfalls would discharge storm water, rock runoff, tank bottom water, and hydrostatic test water and that Citgo might discharge the hydrostatic test water to the ECSD treatment plant. The inspection report also indicates that holes and pipes that discharged into the "canal" had been sealed (DCN 052410).

2.11.3 Other Possible PRPs

Other possible PRPs for the AOA identified in the Citgo terminal facility files are summarized in Table 2-5. Cities, Lake Materials, PDVSA, Ronning Oil Corporation, and The Southland Corporation are newly identified possible PRPs. A summary of the information in the document copies pertinent to ECSD is provided in Section 2.16.

TABLE 2-5

OTHER POSSIBLE PRPS ASSOCIATED WITH CITGO TERMINAL FACILITY

Possible PRP	Pertinent Information
Cities	Former facility operator (1929 to 1983); created Citgo in March 1983 (DCN 052395)
ECSD	Operator of treatment plant that might receive facility wastewater (DCN 052410)
Lake Materials	As of 1991, owner of active surface impoundment containing liquid waste and sludge across the street from the facility (DCN 052381)
PDVSA	Former half-owner of Citgo (September 1983 to 1990); full owner of Citgo (1990 to at least 1991) (DCN 052395)
Ronning Oil Corporation	Operator of Citgo service station (DCN 052344)
The Southland Corporation	Former half-owner of Citgo (September 1983 to 1990) (DCN 052395)

2.12 CONSERVATION CHEMICAL OF ILLINOIS

According to a geologic and hydrogeologic study of the Conservation Chemical of Illinois (Conservation Chemical) facility written in 1978, the facility recovered oils and solvents, conducted waste neutralization, and contained temporary storage areas for oils and solvents (DCN 052420).

2.12.1 Facility Location

The Conservation Chemical facility is located at 6500 Industrial Highway in Gary, Indiana. The Grand Calumet River is located about 1 mile south of the facility. This facility is located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996).

2.12.2 Summary of Pertinent Information

The pertinent information presented below on the Conservation Chemical facility was drawn from documents in the Environmental Response file room.

Environmental Response File Room

On November 19, 1976, the ISBH investigated a complaint by the Gary Regional Airport that oil from an adjacent property was draining into ditches on the Gary Regional Airport facility property. Conservation Chemical was the alleged source of the oily waste found in the ditch at the Gary Regional Airport property (DCN 054305; DCN 054306).

According to a geologic and hydrogeologic study of the Conservation Chemical facility written in 1978, facility activities included waste neutralization, temporary storage, oil and solvent recovery, and hauling liquid industrial waste. General facility wastes included oils, solvents, cyanide, acids, sludges, and metal salts. The direction of surface drainage at the facility is southward toward the Grand Calumet River. The direction of groundwater flow is generally toward Lake Michigan and the Grand Calumet River (DCN 052420).

As described below, a series of spills have occurred at the facility.

- September 1975: Oil leaked from on-site storage tanks into a diked area surrounding the tanks. An agreed order dated December 29, 1972, required that all diked areas be kept empty and that they not be used for waste storage (DCN 052430).
- December 22, 1981: 16,000 gallons of waste solvents leaked from a storage tank. The waste solvents accumulated in two areas surrounding the damaged tank. The waste solvents contained methylene chloride, ethyl alcohol, ethyl acetate, xylene, toluene, naphthas, and heavy oil. During an investigation conducted on the day of the spill, EPA found that the ground surface was frozen and thus that the waste material did not leach into the subsurface soil. As part of the cleanup measures, the contaminated surface soil was excavated, and groundwater sampling was performed. Samples collected from the pooled waste material on December 23, 1981, contained methylene chloride; ethyl alcohol; ethyl acetate; xylene; toluene; trichloroethylene; methyl ethyl ketone; ethylbenzene; and 1,1,1-trichloroethane (DCN 052420).
- January 20, 1983: 207 gallons of cyanide leaked from a storage tank, of which 70 gallons was recovered and stored in drums. The spill area was saturated with sodium hypochlorite to oxidize the cyanide (DCN 052419).
- August 27, 1984: About 1 gallon of solvent material leaked onto the ground from a 2-inch-diameter pipe attached to a solvent storage tank. Absorbent material was placed on the spill location (DCN 052417).
- August 28, 1984: Two spills from storage tanks were reported. One spill involved about 20 gallons of nitric acid plating solution that contained heavy metals, nickel, and copper. The spill was neutralized with lime and water. Part of the contaminated soil was excavated, and the facility planned to remove the remaining contaminated soil during storage tank relocation activities in September 1984. The second spill involved No. 6 oil and water. The spilled oil and water were contained in the diked area around the storage tank. The leaking tank was to be emptied, and the area around the tank was to be cleaned up (DCN 052417).

- January 17, 1986: Kerosene, fuel oil, and PCB-contaminated product were released to soil. This release affected an area of about 15,000 square feet (DCN 052416).

Solid and Hazardous Waste Management File Room

No pertinent documents regarding the Conservation Chemical facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

No documents for the Conservation Chemical facility were found in the Water Management file room, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in this file room.

2.12.3 Other Possible PRPs

No other possible PRPs for the AOA were identified in the Conservation Chemical facility files.

2.13 CUMMINS NORTHERN ILLINOIS

The Cummins Northern Illinois facility services and supplies parts for truck engines (DCN 052431). At the time of a 1990 inspection, the company had recently changed its name from Cummins Mid-States to Cummins Northern Illinois (Cummins) (DCN 052431).

2.13.1 Facility Location

The Cummins facility is located at 1440 Texas Street in Gary, Indiana (DCN 052431). This facility is an industrial discharger to GSD located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996).

2.13.2 Summary of Pertinent Information

The pertinent information presented below on the Cummins facility was drawn from documents in the Solid and Hazardous Waste Management and Water Management file rooms.

Environmental Response File Room

No documents for the Cummins facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

On June 5, 1990, Metcalf & Eddy, Inc. (M&E), conducted a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection and Land Disposal Restriction inspection at the Cummins facility. M&E found that Cummins facility operations involved use of multiple parts cleaning facilities, including a dip tank containing sodium hydroxide solution (D002); three parts washing basins containing mineral spirits (D001); and an aluminum-cleaning tank containing chlorinated hydrocarbons, cresylic acid, and surfactants (D004). The facility had notified EPA that it was a small-quantity generator of D001 and D002 wastes; however, Cummins had not notified EPA of the D004 waste that it generated. M&E recommended that a letter of noncompliance be sent to Cummins (DCN 052431).

Water Management File Room

On February 4, 1994, the IDEM Office of Water Management conducted an inspection in response to a complaint that antifreeze and oil had accumulated in back of the Cummins facility. IDEM found that a broken pipe was allowing used antifreeze to spill in an enclosed, diked area. The broken pipe was repaired during the inspection. A "Safety-Kleen Generator Used Antifreeze Annual Certification/Indemnification" form dated February 4, 1994, showed "150 gallons" handwritten next to "used antifreeze generated." The document did not clearly indicate whether the handwritten value pertained to the spill (DCN 052434).

Also, during the inspection an oil sheen was observed in an on-site sewer line and in a manhole on Texas Street. Cummins facility wastewater flows south through a 15th Avenue sewer line and then to the GSD treatment plant. IDEM found that a facility oil separator and grease trap needed to be cleaned out. A follow-up investigation after the inspection revealed that oil was entering the sewer line from the Cummins facility (DCN 052434).

2.13.3 Other Possible PRPs

Cummins Mid-States and GSD were identified as other possible PRPs for the AOA during Tetra Tech's review of the Cummins facility files. Cummins Mid-States is the former name of the Cummins facility (DCN 052431). Cummins Mid-States is a newly identified possible PRP. The Cummins facility discharges its wastewater to the GSD treatment plant. In 1994, an oil sheen was observed in an on-site sewer line and nearby manhole through which facility wastewater flows (DCN 052434). A summary of the information in the document copies pertinent to GSD is provided in Section 2.23.

2.14 DIXIE DAIRY COMPANY

The Dixie Dairy Company (Dixie Dairy) facility processes raw milk in separating and blending operations. The facility then pasteurizes and homogenizes milk products before their packaging. Other products processed at the Dixie Dairy facility include fruit drinks and bottled water (DCN 052439).

2.14.1 Facility Location

The Dixie Dairy facility is located at 1200 West 15th Avenue in Gary, Indiana (DCN 052439). This facility is located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996).

2.14.2 Summary of Pertinent Information

The pertinent information presented below on the Dixie Dairy facility was drawn from documents in the Water Management file room.

Environmental Response File Room

No pertinent documents regarding the Dixie Dairy facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

No documents for the Dixie Dairy facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

The Dixie Dairy facility is a significant industrial user that discharges wastewater to the GSD treatment plant. In the 1994 GSD annual report, the Dixie Dairy facility is listed in the category of minor noncompliance industrial user. Minor noncompliance users include industrial facilities that were out of compliance at least one or two times during the 1994 reporting period. The Dixie Dairy facility's noncompliance involved "conventional pollutants" and oil and grease (DCN 052439). According to a 1995 IDEM letter, wastewater discharged from the Dixie Dairy facility to the GSD treatment plant contains polar (animal and vegetable) oil and grease, and toxic organics are not an issue (DCN 052437).

2.14.3 Other Possible PRPs

GSD was identified as another possible PRP for the AOA during Tetra Tech's review of the Dixie Dairy facility files (DCN 052439). The Dixie Dairy facility discharges its wastewater to the GSD treatment plant. A summary of the information in the document copies pertinent to GSD is provided in Section 2.23.

2.15 EAST CHICAGO INDUSTRIAL CENTER

The East Chicago Industrial Center facility produces grindings for power plants (IDEM 1996).

2.15.1 Facility Location

The East Chicago Industrial Center facility is an industrial discharger to the ECSD, which is located in Priority Reach E, the fork of the East-West Branch of the Indiana Harbor Ship Canal to the west end of Roxana Marsh (IDEM 1996). The location of the facility is not identified in the documents photocopied for the PRP search.

2.15.2 Summary of Pertinent Information

The pertinent information presented below on the East Chicago Industrial Center facility was drawn from documents in the ECSD file in the Water Management file room.

Environmental Response File Room

No documents for the East Chicago Industrial Center facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

No documents for the East Chicago Industrial Center facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

The East Chicago Industrial Center facility is an industrial discharger of wastewater to the ECSD treatment plant. The East Chicago Industrial Center facility was in total compliance according to ECSD industrial compliance status reports dated March 31, 1995 (DCN 054320); January 25, 1996 (DCN 054316); April 25, 1996 (DCN 054312); and July 25, 1996 (DCN 054308).

2.15.3 Other Possible PRPs

ECSD was identified as another possible PRP for the AOA during Tetra Tech's review of the East Chicago Industrial Center facility files (DCN 054320). A summary of the information in the document copies pertinent to ECSD is provided in Section 2.16.

2.16 EAST CHICAGO SANITARY DISTRICT

ECSD operates a 15 million gallon per day tertiary treatment plant that discharges to the Grand Calumet River. About 20 percent of the wastewater received by the WWTP originates from industrial sources (IDEM 1996).

2.16.1 Facility Location

The ECSD facility is located at 5200 Indianapolis Boulevard in East Chicago, Indiana (DCN 052452). This facility is located on the south bank of the Grand Calumet River. The facility is located in Priority Reach E, the fork of the East-West Branch of the Indiana Harbor Ship Canal to the west end of Roxana Marsh (IDEM 1996).

2.16.2 Summary of Pertinent Information

The pertinent information presented below on the ECSD facility was drawn from documents in the Solid and Hazardous Waste Management and Water Management file rooms.

Environmental Response File Room

No pertinent documents regarding the ECSD facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

On February 5, 1981, the ISBH inspected the service administration area of the City of East Chicago Garage in response to a report by an Indiana Water Pollution Division employee of waste drums being dumped on the bank of the Grand Calumet River behind the garage. During the inspection, the garage superintendent explained that the area along the Grand Calumet River was used to wash residue from drums received from local industries. The drums were burned before rinsing. During the inspection, burned drum tops were found along the riverbank; however, the inspectors did not observe any evidence of dumped waste (DCN 052446). The facility documents do not indicate where the City of East Chicago Garage is located or whether it is part of the ECSD facility.

Water Management File Room

In 1988, EPA issued a consent decree for ECSD's ongoing violations of its NPDES permit (No. IN 0022829). In 1993, a compliance order was issued to "East Chicago" for the ECSD facility. An IDEM memorandum dated June 24, 1994, states that EPA would like to close out the consent decree but could not until ECSD met its effluent limits for chloride, sulfate, and phosphorus, which ECSD had violated on a continuing basis. The IDEM memorandum also states that ECSD has a long history of noncompliance (DCN 052481). The relationship between "East Chicago" and ECSD is not made clear in the facility documents.

A February 1995 semiannual organic pollutant scan required by ECSD's NPDES permit (No. IN 0022829) revealed elevated levels of pesticides in WWTP effluent samples. Because the effluent samples were collected during the winter when no industries discharging wastewater to the WWTP used or manufactured pesticides, ECSD ordered testing of an influent sample to determine whether the presence of pesticides was an isolated incident. In addition, elevated levels of chlordane were found in WWTP effluent, influent, and sludge. ECSD claimed that the sample analytical results were tentative because the results could not be confirmed by the laboratory sample analysis (DCN 052475).

A 1995 compliance maintenance annual report for the ECSD facility indicates that the facility exceeded the average monthly limit for total phosphorus in its effluent during 8 out of 12 months. The report also states that the NPDES permit had expired and that the proposed new permit limit for total phosphorus should be sufficient (DCN 052456).

A NPDES compliance inspection report dated April 25, 1996, indicates that Citgo "may" discharge hydrostatic test water to the ECSD (DCN 054339).

East Chicago industrial compliance status reports dated April 25, 1995, to October 23, 1997, identify the facilities listed in Table 2-6 as industrial dischargers of wastewater to the ECSD WWTP.

TABLE 2-6

INDUSTRIAL DISCHARGERS OF WASTEWATER TO THE ECSD FACILITY

Facility Name	Date of Industrial Compliance Status Report in Which Facility Is Cited for a Violation^a	DCN of Industrial Compliance Status Report
American Steel Foundries	NA	NA
Central States Marketing	NA	NA
E.I. duPont de Nemours	NA	NA
East Chicago Industrial Center	NA	NA
General American Transportation Co.	07/25/96	054335
	03/31/95	054349

TABLE 2-6 (Continued)

INDUSTRIAL DISCHARGERS OF WASTEWATER TO THE ECSD FACILITY

Facility Name	Date of Industrial Compliance Status Report in Which Facility Is Cited for a Violation ^a	DCN of Industrial Compliance Status Report
Inland Steel	04/25/97	054330
	01/23/97	052448
	07/25/96	054335
	04/25/96	054340
LTV Steel Company	04/25/97	054330
	01/23/97	052448
Mid-West Flame Hardening	03/31/95	054349
Mobil Oil	01/25/96	054345
National Processing Corp.	10/23/97	054322
	07/24/97	054326
Phillips Pipe Line	04/25/97	054330
	01/23/97	052448
	07/25/96	054335
	04/25/96	054340
	01/25/96	054345
Praxair, Inc.	10/23/97	054322
	07/24/97	054326
	01/23/97	052448
	07/25/96	054335
	04/25/96	054340
	01/25/96	054345
	03/31/95	054349
Safety-Kleen Oil Recovery Company	10/23/97	054322
	07/24/97	054326
	04/25/97	054330
	01/23/97	052448
	07/25/96	054335
	03/31/95	054349

TABLE 2-6 (Continued)

INDUSTRIAL DISCHARGERS OF WASTEWATER TO THE ECSD FACILITY

Facility Name	Date of Industrial Compliance Status Report in Which Facility Is Cited for a Violation ^a	DCN of Industrial Compliance Status Report
Shell Oil Company	NA ^b	NA
U.S. Gypsum	04/25/96	054340
	01/25/96	054345
U.S. Reduction	07/24/97	054326
	04/25/97	054330
	04/25/96	054340
	01/25/96	054345
Union Tank Car	07/24/97	054326
United Rail Services	10/23/97	054322
	07/24/97	054326
	04/25/97	054330
	01/23/97	052448
	07/25/96	054335
	04/25/96	054340
	01/25/96	054345
	03/31/95	054349

Notes:

^a A facility not cited for a violation in an East Chicago industrial compliance status report was considered to be in total compliance at the ECSD WWTP during the period the report covers.

^b Permanently ceased discharging to the district

NA = Not applicable

2.16.3 Other Possible PRPs

The facilities listed in Table 2-7 were identified as other possible PRPs for the AOA during Tetra Tech's review of the ECSD facility files. These possible PRPs fall into one of three categories: (1) facilities previously identified by IDEM and sent a PRP notice letter, (2) facilities previously identified by IDEM and addressed in this PRP search report, and (3) facilities that are newly identified possible PRPs.

TABLE 2-7

OTHER POSSIBLE PRPs ASSOCIATED WITH ECSD FACILITY

Possible PRP	Pertinent Information	Possible PRP Category
American Steel Foundries	Discharged wastewater to ECSD WWTP	2.2 ^b
Central States Marketing	Discharged wastewater to ECSD WWTP	2.7
Citgo Petroleum Corporation	May have discharged hydrostatic test water to ECSD WWTP (DCN 054339)	2.11 ^b
City of East Chicago	Rinsed used industrial drums along Grand Calumet River (DCN 052448)	Newly identified ^c
E.I. duPont de Nemours	Discharged wastewater to ECSD WWTP	PRP notice letter sent ^d
East Chicago Industrial Center	Discharged wastewater to ECSD WWTP	2.15 ^b
General American Transp. Co.	Discharged wastewater to ECSD WWTP	PRP notice letter sent ^d
Inland Steel Company	Discharged wastewater to ECSD WWTP	PRP notice letter sent ^d
LTV Steel Company	Discharged wastewater to ECSD WWTP	PRP notice letter sent ^d
Mid-West Flame Hardening	Discharged wastewater to ECSD WWTP	2.34 ^b
Mobil Oil Corp.	Discharged wastewater to ECSD WWTP	PRP notice letter sent ^d
National Processing Corp.	Discharged wastewater to ECSD WWTP	2.36 ^b
Phillips Pipe Line	Discharged wastewater to ECSD WWTP	PRP notice letter sent ^d
Praxair, Inc.	Discharged wastewater to ECSD WWTP	2.44 ^b
Safety-Kleen	Discharged wastewater to ECSD WWTP	2.50 ^b
Shell Oil Company	Discharged wastewater to ECSD WWTP	2.52 ^b
Union Tank Car Co.	Discharged wastewater to ECSD WWTP	2.57 ^b
United Rail Services	Discharged wastewater to ECSD WWTP	2.58 ^b
United States Gypsum	Discharged wastewater to ECSD WWTP	2.59 ^b
United States Reduction	Discharged wastewater to ECSD WWTP	2.60 ^b

Notes:

- ^a DCN 054326 is the source of the pertinent information for all the possible PRPs except Citgo and the City of East Chicago.
- ^b This other possible PRP was previously identified by IDEM and is addressed in the PRP search report in the section indicated.
- ^c This is not on the list of 100 facilities provided by IDEM.
- ^d This possible PRP has previously received a PRP notice letter from IDEM.

2.17 ENERGY COOPERATIVE, INC.

The Energy Cooperative, Inc. (ECI), facility operated as an oil refinery. Operations began at this facility in 1919; however, state and federal records do not indicate who initially operated the refinery. The facility was purchased by Sinclair Oil Company in 1924. In 1968, Atlantic Richfield Company (ARCO) bought the facility, and ARCO operated it until it was sold in 1976 to Cooperative Petroleum Inc. The name of this firm was changed from Cooperative Petroleum Inc. to ECI in 1978. ECI operated the facility until 1981, when it filed for bankruptcy under Chapter 11. Between 1981 and 1983 or 1984, facility operations were largely limited to storage of product and waste in tanks; some blending and sale of product may have occurred. In 1984, the bankruptcy case was converted to Chapter 7, and in 1989, the facility was conveyed to the City of East Chicago, Indiana, in lieu of taxes (DCN 052533). However, according to a final incident report dated July 24, 1990, the facility is owned by the East Chicago Property Improvement Corporation (DCN 052482).

2.17.1 Facility Location

The ECI facility is located at 3500 Indianapolis Boulevard in East Chicago, Indiana (DCN 053486). This facility is located in Priority Reach H, Columbus Drive to the Railroad Overpass and the Lake George Branch of the Indiana Harbor Ship Canal (IDEM 1996). The East Chicago Property Improvement Corporation is located at 4525 Indianapolis Boulevard in East Chicago, Indiana (DCN 052482).

2.17.2 Summary of Pertinent Information

The pertinent information presented below on the ECI facility was drawn from documents in the Environmental Response and Solid and Hazardous Waste Management file rooms.

Emergency Response File Room

On March 17, 1987, an oil sheen was observed surrounding a sunken vessel in the Indiana Harbor Ship Canal. The vessel sunk at a city pier 50 yards northeast of the E&J railroad bridge. The sheen extended from Indianapolis Boulevard to 3,000 yards northeast of Dicky Street Bridge. A U.S. Coast Guard (USCG) report indicates that the sheen consisted of 25 gallons of diesel fuel. The diesel fuel was not recovered. The ECI facility is not mentioned in the USCG report; however, the report was included in the ECI facility file (DCN 052491).

On March 20, 1987, a fire occurred at the ECI facility. A spark from a torch ignited the petroleum product residuals in a tank that was being removed. The fire was extinguished in 5 minutes. According to an incident reporting log, water in the area was not affected. The incident reporting log states that the facility is a Superfund site. The incident reporting log also indicates that the facility is an abandoned refinery containing asbestos, hazardous waste drums, hydrogen sulfide, and tetraethyl lead pits (DCN 052486).

On July 24, 1990, petroleum product was spilled at the abandoned ECI facility and entered the Lake George Arm of Indiana Harbor. The spill area was about 300 acres in size. EPA contracted Clean Harbors Inc. (Clean Harbors) to provide containment and recovery services for the spilled petroleum product. Clean Harbors constructed an underflow dam that contained and recovered the petroleum product that surfaced in the spill area (DCN 052482).

Solid and Hazardous Waste Management File Room

ECI operated the facility from 1976 until 1981, when ECI filed for bankruptcy and stopped refining crude oil at the facility; operations such as petroleum storage continued until 1983. As of August 1991, the facility was being operated by the City of East Chicago and ARCO Petroleum. According to an E&E report, ARCO Petroleum was recovering oils from the soil on the facility property "before it ran off into the harbor" (DCN 052492).

A contractor, ERM North Central, conducted a study at the ECI facility and prepared a final report dated September 26, 1984. The report indicates that numerous environmental hazards were found at the abandoned facility, including tanks and containers filled with product and waste. In addition, asbestos from pipe insulation, electrical transformers containing PCBs, and a layer of hydrocarbons on the shallow groundwater were present at the facility (DCN 052533).

From 1984 to 1989, Conestoga-Rovers and Associates conducted remedial work at the facility. The remedial work conducted is summarized below; the completeness and efficiency of the work were questioned by ARCO (DCN 052533).

- Demolition of aboveground refinery structures
- Capping of underground pipelines
- Removal and disposal of stored product and waste
- Grading of the facility surface to minimize ponding of rainfall

In August 1991, E&E drafted a PA Prescore report for the ECI facility. According to the report, the facility includes five inactive parcels of land: the main refinery, the south tank farm, the southwest tank farm, the west tank farm, and the pollution control area. The south and southwest tank farms are separated from the rest of the facility by the Indiana Harbor Ship Canal. Facility products included mineral spirits, propane, leaded gasoline, unleaded gasoline, kerosene, No. 2 fuel oil, No. 5 fuel oil, No. 6 fuel oil, asphalt and related products, liquid propane gas, grease, lubricating oils, paraffin wax, phenol, and sulfur. Other materials stored or deposited on site included 2-butanone (methyl ethyl ketone); diethanol amine; lead oxide; silicon dioxide alumina catalyst; PCBs; cutting oils; solvents; lead salts; dyes; oil emulsion solids from refining (waste code K049); separator sludge (K051); and petroleum additives such as lead and 1,2-dichloroethane. In addition, leaded tank bottoms (waste code K052) were disposed of in on-site pits (DCN 052492).

The E&E report indicates that 4-foot-thick releases of a petroleum-based product were found floating on the facility groundwater. A boom was installed in the Indiana Harbor Ship Canal to prevent migration of the floating contaminants. E&E estimated the total minimum hydrocarbon volume in groundwater to be about 2.3 million gallons. The contaminated aquifer of concern is the Calumet Aquifer, which is about 30 feet thick and is underlain by a nearly impermeable till. An oily sheen was observed in the canal; a sample of this substance contained constituents similar to those of the product floating on facility groundwater (DCN 052492).

As of August 1991, the City of East Chicago was developing a closure plan for the facility. In addition, the facility was being considered as a disposal site for Indiana Harbor dredgings (DCN 052492).

According to an undated document, May 11, 1993, [REDACTED] for filing of administrative claims against ECI's Chapter 11 estate. Claims could still be filed against ECI's Chapter 7 estate after that date,

but any such claims would be limited to those arising while the Chapter 7 case was pending (DCN 052533).

Water Management File Room

No documents for the ECI facility were found in the Water Management file room, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in this file room.

2.17.3 Other Possible PRPs

The parties listed in Table 2-8 were identified as other possible PRPs for the AOA during Tetra Tech's review of the ECI facility files (DCN 052492). All of these parties are newly identified possible PRPs.

TABLE 2-8

OTHER POSSIBLE PRPS ASSOCIATED WITH ECI FACILITY

Possible PRP	Pertinent Information
ARCO	Owner and operator of the facility from 1968 to 1976 (DCN 052492)
ARCO Petroleum	Operator of the facility as of 1991 (DCN 052492)
City of East Chicago	Owner of the facility as of 1989 (DCNs 052492 and 052533)
Cooperative Petroleum Inc.	Former name of ECI (DCN 052533)
East Chicago Property Improvement Corporation	According to a 1990 document, the owner of the facility (DCN 052484)
Sinclair Oil Company	Owner and operator of facility from 1924 to 1968 (DCN 052492)

2.18 EXPLORER PIPELINE COMPANY

The Explorer Pipeline Company (Explorer) is an interstate common carrier that manages pipelines for refined petroleum products. A total of 14 pipeline breakout tanks are present at its Hammond Station facility. According to a 1995 Explorer letter to IDEM, the owner of this facility is Explorer, a private company with its corporate headquarters in Tulsa, Oklahoma (DCN 052541).

2.18.1 Facility Location

The Explorer facility is located at 3737 Michigan Street in Hammond, Indiana (DCN 052539). This facility is located in Priority Reach C, Cline Avenue to Kennedy Avenue (IDEM 1996). Also, a spill report indicates that an Explorer meter station exists on Avenue H in Griffith, Indiana (DCN 052538).

2.18.2 Summary of Pertinent Information

The pertinent information presented below on the Explorer facility was drawn from documents in the Environmental Response and Water Management file rooms.

Environmental Response File Room

On December 31, 1978, an oil spill occurred at the Explorer meter station on Avenue H (between Kennedy and Cline Avenues) in Griffith, Indiana. About six drums of oil spilled because of an O-ring failure. The spill area was cleaned up (DCN 052538).

On March 4, 1993, about 420 gallons of unleaded gasoline leaked from a valve at the Explorer facility in Hammond, Indiana. The spill area covered about 1,200 square feet. The ground was frozen, so the material collected around a sump area instead of leaching into the ground. The spill area was cleaned up by vacuum trucks (DCN 052536).

Solid and Hazardous Waste Management File Room

No pertinent documents regarding the Explorer facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

In a May 17, 1995, NOI letter to IDEM regarding NPDES General Permit Rules in 327 Indiana Administrative Code (IAC) 15, "Wastewater Discharges Associated with Petroleum Terminals," Explorer explains that the receiving water for its Hammond facility is an unnamed tributary to the Grand Calumet River. The facility's storm water discharges to the unnamed tributary as well. Tank bottom and hydrostatic test water discharges into an aerated retention, evaporation, and infiltration pond in the south-central part of the facility. If the pond overflows, the material enters the unnamed tributary that flows into the Grand Calumet River (DCN 052541).

On July 3, 1996, IDEM's Office of Water Management conducted a NPDES compliance inspection at the Explorer facility under NPDES Permit No. ING340012. No unsatisfactory ratings were given during the inspection. On June 4, 1997, a NPDES facility inspection was conducted at the Explorer facility. According to the inspection report, the facility was cited for four violations from June 1996 to April 1997: two violations involved oil and grease and two involved TSS in discharged facility tank bottom water (DCN 052539).

2.18.3 Other Possible PRPs

No other possible PRPs for the AOA were identified in the Explorer facility files.

2.19 FLYING J INC.

The Flying J Inc. (Flying J) facility is a truck stop. The facility provides semi-truck washing, lubrication, and tire repair services and contains a restaurant, showers, and a laundering facility (DCN 052558). A notifier database information update form dated August 27, 1993, in the Flying J files indicates that Summerfield GMC Truck Company changed its name to Flying JJ Care (DCN 052553). However, the relationship between Flying J, Flying JJ Care, and Summerfield GMC Truck Company is not made clear in the files. File documents dated before and after 1993 refer to the facility as Flying J.

2.19.1 Facility Location

The Flying J facility is located at 3150 Grant Street in Gary, Indiana (DCN 052550). This facility is an industrial discharger to GSD located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996).

2.19.2 Summary of Pertinent Information

The pertinent information presented below on the Flying J facility was drawn from documents in the Environmental Response, Solid and Hazardous Waste Management, and Water Management file rooms.

Environmental Response File Room

On April 29, 1993, two 6,000-gallon, steel gasoline USTs were removed from the Flying J facility. According to an IDEM 20-day report dated May 20, 1993, and prepared by ATEC Associates, Inc. (ATEC), a release was reported because petroleum odors were detected in the UST excavation. The release appeared to be limited to the backfill in the tank pit. Soils surrounding the tank pit consisted of silty clays. The 20-day report states that no impacts on nearby utilities or surface waters were identified (DCN 052550). ATEC recommended that the impacted backfill be treated on site or transported to an approved special waste landfill. According to the 20-day report, a corrective action plan and a 45-day initial site characterization report were requested from ATEC (DCN 052550). However, Tetra Tech found no further information on the incident in the facility files.

On July 15, 1994, cleaning compound (car wash soap) and combustible liquid containing petroleum distillates were spilled in a truck trailer owned by Zeitner & Sons, Inc., at the Flying J facility. Cedar Crown Enterprises, Inc., was contracted by Zeitner & Sons, Inc., to clean up the spill on the day of the incident. According to the final report prepared by Cedar Crown Enterprises, Inc., the 5-gallon pails containing the cleaning compound and combustible liquid were removed, and the inside of the trailer was cleaned up. A rug was placed under the trailer and a rag was placed in the drainhole of the trailer when the spill was discovered, so no cleanup was necessary outside the trailer (DCN 052546).

Solid and Hazardous Waste Management File Room

As discussed above, a notifier database information update form dated August 27, 1993, indicates that Summerfield GMC Truck Company changed its name to Flying JJ Care, but the significance of this information with regard to the Flying J facility is unclear. The EPA identification number for the facility associated with the name change is IND 016 344 350 (DCN 052553).

Water Management File Room

In the 1994 GSD annual report, the Flying J facility is listed in the category of significant noncompliance industrial user for failure to provide self-monitoring data within 30 days of the due date (DCN 052558).

According to an appearance of counsel and request for hearing on a disputed bill in the matter of Flying J, a letter dated June 1, 1995, from GSD to Flying J set forth the findings of an informal hearing conducted on May 16, 1995, and ordered payment of \$69,000 in penalties. Flying J disputed the amount of the penalties based on mitigating factors, including the following: (1) violations were remedied upon Flying

J's learning of them and (2) the violations were related to submitting documents on time and did not result in any harm to human health or the environment (DCN 052554).

2.19.3 Other Possible PRPs

Other possible PRPs for the AOA identified in the Flying J facility files are summarized in Table 2-9. A summary of the information in the document copies pertinent to GSD is provided in Section 2.23. Flying JJ Care; Summerfield GMC Truck Company; and Zeitner & Sons, Inc., are newly identified possible PRPs.

TABLE 2-9

OTHER POSSIBLE PRPS ASSOCIATED WITH FLYING J FACILITY

Possible PRP	Pertinent Information
Flying JJ Care	Document in files refers to facility operator as Flying JJ Care (DCN 052553)
GSD	Operator of treatment plant that receives facility wastewater (DCN 052558)
Summerfield GMC Truck Company	Former name of Flying JJ Care (DCN 052553)
Zeitner & Sons, Inc.	Owner of truck trailer in which spill occurred at the Flying J facility (DCN 052546)

2.20 GARY DEVELOPMENT COMPANY, INC.

Documents in the Environmental Response, Solid and Hazardous Waste Management, and Water Management file rooms use the names Gary Development Landfill, Gary Land Development Landfill, and Gary Land Development Company in referring to the Gary Development Company, Inc. (GDC), facility; however, no documentation of official name changes for the GDC facility was found during the file review.

The GDC facility is a sanitary landfill. The Indiana Stream Pollution Control Board approved construction of the facility in June 1973 and granted an operating permit for the facility in February 1975. The sanitary landfill proposal submitted on May 31, 1973, by the Gary Land Development Company called for an exterior perimeter drainage system, sand pit sidewalls sealed with clay, an interior leachate collection system to be connected to the ECSD sewers, daily cover with clay, no dumping of liquid or sludge wastes, and a system of monitoring wells around the perimeter of the facility (DCN 054157). However, the final construction of the GDC facility did not conform to any of these specifications (DCN 054157).

The GDC facility mainly accepted municipal waste until August 1989, when it ceased operations as a landfill. The facility allegedly accepted hazardous waste from several hazardous waste generators, based on certified annual reports (DCN 054128).

In October 1986, IDEM sent the GDC facility a recommended findings of fact, conclusions of law, and order of the administrative law judge stating that the facility was not in compliance with the Indiana Pollution Control Act, its construction permit, and its operating permit. On March 9, 1994, the Water Pollution Control

Board entered an order modifying the recommended findings of fact, conclusions of law, and order of the administrative law judge issued on April 26, 1991. EPA has a hazardous waste case pending against the GDC facility (IDEM 1996).

2.20.1 Facility Location

The GDC facility is located at 479 North Cline Avenue in Gary, Indiana. The facility occupies about 62 acres and is bordered on the south by the Grand Calumet River (DCN 054128). The facility is located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996).

2.20.2 Summary of Pertinent Information

The pertinent information presented below on the GDC facility was drawn from documents in the Environmental Response, Solid and Hazardous Waste Management, and Water Management file rooms.

Environmental Response File Room

In 1976, analytical results for groundwater samples collected at the GDC facility (EPA ID No. IND 077 005 916) exceeded Federal Drinking Water Standards for chromium, lead, cadmium, arsenic, and fluoride (DCN 052589).

On August 26, 1976, arsenic was detected at significant levels in samples collected from three GDC facility ditches that discharge to the Grand Calumet River. In addition, significant levels of chromium and lead were found in samples collected from GDC facility ditches (DCN 052589).

On March 9, 1976, ISBH witnessed discharge of leachate from the GDC facility leachate collection system to the Grand Calumet River. The facility did not have an NPDES permit for this discharge. In addition, ISBH observed dumping of paint and oil waste in the landfill (DCN 052590).

Until a consent decree settlement was reached with the State of Indiana in 1983, liquid wastes from the GDC facility leachate collection system were discharged into the Grand Calumet River without an NPDES permit (DCN 052572).

A 1983 sampling event at the GDC facility's west ditch, which flows into the Grand Calumet River, revealed organic contaminants. In 1984, sampling of on-site monitoring wells and the west ditch revealed the presence of 12 contaminants at Level II (EPA Prescore Model). The contaminants included 1,1-dichloroethane; trans-1,2-dichloroethane; 2-butanone; benzylbutyl phthalate; pyrene; nickel; and arsenic (DCN 052565).

On June 28, 1988, a landfill fire occurred at the GDC facility for the third time in 1 month. The June 28 fire burned for about 2.5 days before being extinguished by means of fly ash capping. The IDEM incident reporting log states that the "CERCLA Assessment Report claims various paint and biological sludges, asbestos, herbicides, lime cakes, and API separator bottoms (all presumed non-containerized) were placed into the landfill between 1976 and 1989" (DCNs 052585 and 052578).

A 1991 PA report prepared for EPA identifies potential contamination of the Grand Calumet River as a result of surficial runoff and leachate from the GDC facility. The PA report states that the facility leachate collection system discharged into the Grand Calumet River for a number of years without an NPDES

permit and that this discharge practice was stopped in 1983 as a result of a consent decree settlement with the state. Thereafter, the liquid leachate was mixed with lime and fly ash to form a rocklike cover material. The facility petitioned and received approval from ISBH to receive industrial wastes, some of which contained varying amounts of hazardous chemicals. In addition, the PA report summarizes probable contaminants of concern at the facility (DCN 052572). Table 2-10 is based on this summary.

TABLE 2-10

PROBABLE CONTAMINANTS OF CONCERN AT THE GDC FACILITY (DCN 052572)

Contaminated Materials	Amount (cubic yards)	Comments
Sludge	71,000	Include oil sludge, lime, paint, and activated biological sludges
Oily wastes	22,000	Include recovery tank bottoms containing phthalates at 10 µg/L
Solvents	Unknown	Contain trichloroethene at 68 µg/L
Pesticide	120	"Herbicides"
Organic-contaminated materials	Unknown	Contain 2-butanone at 510 µg/L
Inorganic-contaminated materials	1,655	Include asbestos, fly ash, and solids
Heavy metal-contaminated materials	95,300	Include aluminum dross, milling dust, fly ash, and slag containing nickel (266 µg/L), lead (61 µg/L), arsenic (10 µg/L), and cadmium (4.9 µg/L)

A 1991 potential hazardous waste site PA for the GDC facility makes the following observations (DCN 052579):

- Substances possibly present at the facility include organics (persistent and ignitable), inorganics (soluble, corrosive, and volatile), solvents (ignitable, volatile, and flammable), heavy metals (toxic and persistent), sludges (toxic and persistent), and oily wastes (soluble and flammable).
- Aquatic flora could be contaminated by facility waste discharged to the Grand Calumet River.
- Some of the material present at the facility can bioaccumulate in fish in the Grand Calumet River and in birds that visit the facility.

- Leachate from the facility is discharged into the Grand Calumet River without an NPDES permit.
- The facility operated without a valid SPC 18 operating permit from 1977 to 1978.
- The facility is geologically unsuitable for waste disposal because of its high groundwater level and permeable soils.
- Significant levels of arsenic, chromium and fluoride are present in the facility discharge to the Grand Calumet River.

A June 1992 site inspection prioritization report for the facility states that heavy metal contamination of a ditch on the GDC facility property was attributed (through sampling) to the Vulcan Materials Company surface impoundment that lies 50 feet west of the ditch. The report also notes the following (DCN 052565):

- The specific sources contributing to groundwater contamination at the GDC facility are uncertain because 11 alleged or known hazardous waste sites lie within a 2-mile radius of the facility.
- Surface waste contamination is not considered to be a major threat to human receptors because of the distance of drinking water intakes from the facility.
- Because of the lack of nearby human receptors for the drinking water and surface water pathways, the facility was assigned a low score by the EPA Prescore Model, considerably lower than the minimum score required for inclusion on the National Priorities List (NPL).

Solid and Hazardous Waste Management File Room

On September 11, 1974, a GDC facility inspection indicated that all necessary construction was completed and that the facility should be given its operating permit. An undated history of facility inspections states that "the two separate collection systems, one for dewatering and one for leachate collection, were never constructed and that leachate is being pumped into the Calumet River instead of being trucked to the Gary Sewage Treatment Plant. Also, the sides of the sand pit have not been adequately lined with clay, and daily cover when applied is with sand not clay as specified" (DCN 054168).

On January 30, 1975, the GDC facility was inspected by ISBH, revealing that liquid wastes were being deposited in the landfill (DCN 054168).

On November 17, 1975, ISBH ordered the GDC facility to stop accepting unauthorized hazardous waste, install monitoring wells, and improve covering of refuse. Subsequent ISBH inspections revealed no improvement in the operation of the facility (DCN 054168).

On January 12, 1976, ISBH ordered the GDC facility to immediately cease all dumping of liquid sludge and hazardous waste (DCN 054168).

A February 11, 1976, inspection of the GDC facility by ISBH revealed an operating deficiency: surface water was draining over and through wastes (DCN 054172).

A February 26, 1976, inspection of the GDC facility revealed that leachate collected from the facility was being directly pumped into the Grand Calumet River. In addition, the inspection report notes that a body of evidence was developing that hazardous industrial liquid and sludge wastes were being accepted by the facility without approval (DCNs 054170 and 054171).

A May 11, 1976, inspection of the GDC facility by ISBH revealed an operating deficiency: facility dewatering liquid was being contaminated with leachate and was subsequently pumped into the Grand Calumet River (DCN 054167).

Analysis of GDC facility leachate samples collected on August 27, 1976, revealed significant amounts of heavy metals and oils. This leachate was being pumped into the Grand Calumet River. A violation letter was sent to GDC on November 5, 1976, citing the facility for violation of the Environmental Management Act because of the facility's discharge of leachate to the Grand Calumet River (DCN 054157).

During an October 5, 1976, inspection of the GDC facility by ISBH, Larry Hagen of GDC was informed of analytical results for water samples collected from the facility outfall to the Grand Calumet River on August 26, 1976. These results showed the facility to be polluting the Grand Calumet River. In addition, the inspector noted aluminum dust piled at the GDC facility. Mr. Hagen stated that the aluminum dust was from U.S. Reduction, he did not have an approval letter for acceptance of this waste, and "no one had questioned him on it before." An oily substance was also found to be puddled in the middle of the facility garbage area. Mr. Hagen stated that the oily substance was from catch basins cleaned by General Drainage. The facility had approval letters for the oily waste from General Drainage (DCN 054163).

On November 5, 1976, ISBH sent a letter to Mr. Hagen stating that the GDC facility was in violation of the Environmental Management Act because of its discharge of leachate to the Grand Calumet River. The letter also states that this violation would not have occurred if the construction plan, which calls for leachate to be collected and trucked to ECSD, had been followed. In addition, the letter calls for immediate corrective action by GDC to prevent any further pollution (DCNs 054158, 054160, 054162, 054165, 054166, and 054167).

During a December 2, 1976, meeting with ISBH, Mr. Hagen stated that he was not going to do anything to correct the facility discharge problem until he heard from his lawyer. In addition, Mr. Hagen stated that he could not afford to run a landfill and comply with all the state's regulations as long as other sites were allowed to operate without having to comply with any state regulations (DCN 054160).

A September 28, 1982, inspection of the GDC facility revealed that leachate from the landfill was being discharged from the American Add Mixtures plant into a ditch along the railroad tracks at the east boundary of the facility property (DCN 054154).

A December 16, 1985, inspection of the GDC facility revealed that a drainage ditch bisecting the facility appeared to be discharging into the Grand Calumet River without a permit. In addition, leachate was rapidly flowing into this ditch, and the water in the ditch appeared to have an oily film on its surface. Also, drainage from Vulcan Materials Company might be entering the facility (DCNs 054148, 054150, 054147, and 054146).

A February 1986 review of the operating permit renewal application for the GDC facility revealed that leachate seeps were not being controlled or stopped. The leachate from these seeps flowed directly or was

washed by runoff into the surface water collection pond, from which it might be pumped into the Grand Calumet River (DCN 054141).

A June 15, 1987, inspection of the GDC facility revealed that leachate seeps were not being controlled or stopped. The leachate from these seeps flowed directly or was washed by runoff into the surface water collection pond, from which it might be pumped into the Grand Calumet River (DCN 054143).

A March 1992 compliance evaluation inspection of the GDC facility by Tetra Tech (at that time PRC Environmental Management, Inc.) revealed the following:

- The facility has been owned and operated by GDC since operations began in 1973.
- The facility has accepted hazardous wastes (primarily F001, F002, F003, F005, and F006 wastes) from several hazardous waste generators in Indiana based on certified annual reports.
- The facility filed a Part A permit application with EPA on November 18, 1980. Hazardous waste codes specified in this Part A permit application include F003, F005, F006, and K087.
- GDC entered into an agreed order (Cause No. N-53) with IDEM on February 18, 1983. The agreed order indicates that the facility may continue to accept nonhazardous waste but not RCRA hazardous waste.
- The facility received a recommended findings of fact, conclusion of law, and order of the administrative law judge (Cause No. N-146) in October 1986 stating that GDC was not in compliance with the February 18, 1983, agreed order; its construction permit; or its operating permit. GDC was not complying with operating standards at the time of three of four IDEM inspections conducted at the facility between issuance of the February 18, 1983, agreed order and issuance of four denial letters to the GDC facility on January 3, 1984. These letters, which were issued by IDEM, revoked four IDEM special permission letters that allowed disposal of special waste at the facility.
- The facility accepted about 330,000 kilograms of manifested hazardous waste (F005) from American Chemical Service in 1981. This fact was revealed during a 1984 EPA inspection of the American Chemical Service facility in Griffith, Indiana (EPA ID No. IND 016 360 265). Additional, unmanifested shipments of the same American Chemical Service waste were sent to the facility from November 1980 to early 1981. Because of its acceptance of this waste, proximity to the Grand Calumet River, and operating deficiencies, GDC was not issued an interim status compliance letter for continued hazardous waste operations. Because the facility did not have interim status or a hazardous waste permit, EPA decided that the landfill must undergo closure and postclosure activities.
- IDEM decided that EPA should take the lead in resolving violations at the facility. IDEM therefore submitted an enforcement referral to EPA, and EPA issued a complaint and compliance order (V-W-86R-45) to GDC on May 30, 1986. The order states the reasons for EPA's regulatory determination, establishes a compliance schedule, and assesses a

civil penalty for the violations indicated. EPA determined that the facility had accepted hazardous waste for disposal without submitting the required notification, achieving interim status, submitting a Part B permit application, implementing a proper groundwater monitoring program, achieving compliance with financial assurance requirements, or meeting other operating requirements. EPA gave the facility 30 days to either achieve compliance or submit plans for compliance with the abovementioned requirements.

- The facility's RCRA Part A permit application for 1980 identifies the following estimated annual quantities of hazardous waste generated: 8.6 acre-feet of F006 waste, 2.0 acre-feet of K087 waste, 0.3 acre-feet of F005 waste, and 0.3 acre-feet of F003 waste.
- Certified annual reports for 1981 received by IDEM indicate that at least two generators sent hazardous waste to the facility. The generators were LTV Steel-Indiana Harbor Works (EPA ID No. IND 005 462 601), and American Chemical Service (EPA ID No. IND 016 360 265). American Chemical Service delivered at least 37 manifested shipments of flammable liquid paint sludge (F005) to the facility for disposal. The type of hazardous waste sent to the facility by LTV Steel-Indiana Harbor Works is not indicated in the file documents.
- EPA reviewed hazardous waste generating processes at American Chemical Service and concluded that any of the following hazardous waste types may have been sent to the facility for disposal: F001, F002, F003, F005, D001, U002, U031, U112, U147, and U154. During a June 17, 1985, IDEM inspection of the facility, Larry Hagen of GDC stated that broken battery cases (D008) and neutralized calcium sulfate were also received from American Chemical Service.
- The facility was generating leachate that could be a hazardous waste (F039). This leachate had not been sampled or analyzed for hazardous constituents or characteristics.
- Tetra Tech noted exposed debris along the facility's north boundary. In the northwest corner of the facility, Tetra Tech found an unfilled area that had standing water. Tetra Tech noted leachate seeps into the east and west edges of the standing water. Tetra Tech also noted smoke that smelled like sulfur venting from the north slope of the landfill. Apparently this smoke came from an underground fire. One monitoring well existed in the north slope area, which was unfenced (DCN 054127).

Water Management File Room

A March 1994 final order of the Water Pollution Control Board directed GDC to stop discharging water offsite until the discharge met the requirements of a valid NPDES permit (DCN 052593).

On September 26, 1996, an inspection of the GDC facility revealed several point source discharges of storm water runoff into the Grand Calumet River at the facility's south boundary. The runoff was laden with sediment from the facility and caused discoloration of the Grand Calumet River along the facility boundary (DCN 052593).

2.20.3 Other Possible PRPs

Other possible PRPs for the AOA identified during Tetra Tech's review of the GDC facility files are listed in Table 2-11. Summaries of the information in the document copies pertinent to the U.S. Reduction and Vulcan Materials Company (AMG Resources) facilities are provided in Sections 2.60 and 2.3, respectively. American Add Mixtures, American Chemical Service, American Maize, American Oil Incinerator, Calumet Waste, General Drainage, and LTV Steel-Indiana Harbor Works are newly identified possible PRPs.

TABLE 2-11

OTHER POSSIBLE PRPS ASSOCIATED WITH THE GDC FACILITY

Possible PRP	Pertinent Information
American Add Mixtures	Operated a fly ash slurry plant in the northeast corner of the GDC facility and discharges to ditch along the east boundary of the GDC facility (DCN 054128)
American Chemical Service	Generated manifested and unmanifested hazardous wastes sent to the GDC facility (DCNs 054128 and 054171)
American Maize	Sent waste to the GDC facility (DCN 054172)
American Oil Incinerator	Sent waste to the GDC facility (DCN 054172)
Calumet Waste	Sent waste to the GDC facility (DCN 054172)
General Drainage	Sent oil waste to the GDC facility (DCN 054163)
LTV Steel-Indiana Harbor Works	Generated hazardous waste sent to the GDC facility (DCN 054128)
U.S. Reduction	Sent aluminum dust to the GDC facility (DCN 054163 and DCN 054404)
Vulcan Materials Company (AMG Resources)	May have been the source of waste draining onto the GDC facility (DCNs 054150 and 052565)

2.21 GARY PUBLIC TRANSPORTATION CORPORATION

The Gary Public Transportation Corporation (GPTC) facility (EPA ID No. IND 981 794 977) is a former bus maintenance facility that operated for more than 25 years (DCNs 052600 and 052635). The facility was destroyed by a fire and subsequently razed; only the foundation of the facility building and concrete floor facility remain on site (DCN 052597). The facility contained seven USTs that were all removed in January 1995 (DCN 052595). The seven USTs stored diesel fuel, gasoline, used oil, heating oil, motor oil, and automatic transmission fluid (DCN 052597).

2.21.1 Facility Location

The former GPTC facility is located at 237 West 22nd Avenue in Gary, Indiana (DCN 052635). This facility is an industrial discharger to GSD located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996).

2.21.2 Summary of Pertinent Information

The pertinent information presented below on the former GPTC facility was drawn from documents in the Environmental Response and Solid and Hazardous Waste Management file rooms.

Environmental Response File Room

A July 23, 1997, office memorandum written by Bruce Oertel of IDEM's Leaking UST Section notes that 122 cubic yards of contaminated soil was removed from the GPTC facility during the UST removal in January 1995. Contamination has been detected in facility soils and groundwater, and groundwater contamination has migrated off site. Groundwater flow beneath the facility is to the southwest toward the Little Calumet River. Recovery of free product from groundwater is underway (DCN 052595).

On June 18, 1997, Integrated Environmental Solutions, Inc. (IES), submitted a site investigation report and corrective action plan to GPTC that address leakage from several USTs at the GPTC facility. IES found that petroleum hydrocarbons in facility groundwater have spread laterally over an area of about 1.5 acres. Petroleum hydrocarbons found in the groundwater include benzene, toluene, ethylbenzene, and xylene (BTEX) and several semivolatile organic compounds were also found in groundwater samples. A groundwater-level measuring event in November 1996 revealed up to 1.5 feet of free product in a monitoring well on the south boundary of the facility. Petroleum hydrocarbon contamination was also found in soils at the facility. IES estimated the mass of petroleum hydrocarbons in facility soils to be on the order of 130,000 kilograms. IES further estimated the total volume of impacted facility soils to be about 100 cubic yards (DCN 052597).

Solid and Hazardous Waste Management File Room

A February 19, 1993, IDEM hazardous waste handler status update form indicates that the GPTC facility at 237 West 22nd Avenue in Gary, Indiana, was no longer operating because the facility had burnt to the ground. The form identifies the mailing address for GPTC as 100 West 4th Avenue, P.O. Box M857, Gary, Indiana (DCN 052635).

Water Management File Room

No documents for the GPTC facility were found in the Water Management file room, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in this file room. However, according to the document titled "Draft: Potentially Responsible Parties for Grand Calumet River/ Indiana Harbor Ship Canal (GCR/IHSC) Contaminated Sediments," GPTC is an industrial discharger to GSD (IDEM 1996).

mix) that was being released into the surrounding soils through a gouge on top of the UST. GRA planned to remove the UST and test the surrounding soils for contamination (DCN 052663).

On November 1, 1995, GRA notified IDEM that an undetermined amount of aviation fuel had been released from a 12,000-gallon AST between August 23 and November 1, 1995. The leaking AST was owned by GRA and was leased to Niemeyer Aviation (DCN 052645). Based on a record review, Niemeyer Aviation indicated that 900 to 1,100 gallons of aviation gasoline was unaccounted for and might have been released from the AST. However, GRA did not believe that the amount of gasoline released was as large as that reported by Niemeyer Aviation because it was unlikely that a leak of that magnitude could occur over a 5-month period without being noticed. No free product was found or recovered in a downgradient recovery trench opened during the emergency response cleanup; however, an oil sheen was present on the water in the trench (DCNs 052648 and 052652).

On November 22, 1995, GRA reported that about 600 gallons of "Jet A" fuel was released from a 4,000-gallon AST. Contaminated soil filling nine 55-gallon drums was excavated from the area around the AST. GRA contracted Environmental Design International, Inc. (EDI) to design a new fuel system and tank system and to delineate soil and groundwater contamination surrounding the tank farm (DCN 052636).

Solid and Hazardous Waste Management File Room

An October 12, 1995, inspection of the GRA facility by IDEM revealed that open dumping of tires, special waste (weed killer), a transformer, roofing materials, used waste oils, paints, roofing tar, tree trunks, and rubber materials was occurring at the west end of the facility (DCN 052691).

A November 4, 1996, RCRA inspection report states that the GRA facility (1) stored hazardous waste in waste piles for more than 90 days; (2) generated used oil, tar, pesticide, and paint wastes from its operations; and (3) contains a former U.S. Army Nike missile site with possible benzene contamination in its basement bunkers. The U.S. Army had used the GRA facility property as an airfield and maintenance area. In addition, according to the inspection report, leasers on the GRA facility property contributed to the waste piles (DCN 052679).

IDEM received a letter from EDI, dated December 18, 1996, regarding hazardous waste in the former barracks area of the GRA facility. The letter states that 39 drums were removed for transport and disposal on December 11, 1996. In addition, the letter states that soils impacted by a fuel spill and associated water would be removed from the facility; however, no additional information about this fuel spill is included in the letter (DCN 052678).

Water Management File Room

An August 22, 1996, letter from Butler Fairman and Seufert, Inc., to the IDEM Office of Water Management states that a storm water pollution prevention plan for the GRA facility would be implemented by November 1996 (DCN 052694).

2.22.3 Other Possible PRPs

In addition to the City of Gary, other possible PRPs for the AOA identified in the GRA facility files are presented in Table 2-12. A summary of the information in the document copies pertinent to Conservation

Chemical is provided in Section 2.12. Niemeyer Aviation and the U.S. Army are newly identified possible PRPs.

TABLE 2-12

OTHER POSSIBLE PRPS ASSOCIATED WITH GRA FACILITY

Possible PRP	Pertinent Information
City of Gary	Owner and operator of GRA facility since 1950 (DCN 052665)
Conservation Chemical of Illinois	The alleged source of oily waste found in a ditch on the GRA facility (DCNs 052665 and 052676)
Niemeyer Aviation	Lessee of a leaking AST at the GRA facility (DCN 052645)
U.S. Army	Formerly used the GRA facility property as an airfield and for maintenance; facility contains a former Nike missile site (DCN 052679)

2.23 GARY SANITARY DISTRICT

GSD was established by the City of Gary, Indiana to provide wastewater treatment for the city. The GSD facility is a treatment plant that discharges treated effluent to the Grand Calumet River. Sludge generated by the GSD facility is disposed of in one of two privately owned landfills (IDEM 1996). In addition, between 1962 and 1987, the GSD facility used the Ralston Street Lagoon (Ralston) facility for sludge disposal (DCN 052716, 052695, and 052705). This section primarily summarizes pertinent information regarding the GSD and Ralston facility from the GSD facility files. Additional information concerning the Ralston facility is provided in Section 2.45.

2.23.1 Facility Location

The GSD facility is located on the south bank of the Grand Calumet River at 3300 West Third Avenue in Gary, Indiana. The facility is located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996). The Ralston facility is located 0.75 mile west of the GSD facility.

2.23.2 Summary of Pertinent Information

The pertinent information presented below on the GSD facility was drawn from documents in the Environmental Response and Water Management file rooms.

Environmental Response File Room

Between 1962 and 1987, the GSD facility used the Ralston facility for permanent disposal of raw and digested sewage sludges (DCN 052695). According to an undated report on the Ralston facility, the GSD facility digesters were nonfunctional, and raw sludge was being discharged daily to the Ralston facility (DCN 052716).

During a 1983 assessment of the Ralston facility by Salisbury Engineering, Inc., samples of lagoon sludge were found to contain the following constituent concentrations (DCN 052705):

- PCBs as high as 1,158 mg/kg
- Lead as high as 1,173 mg/kg
- Nickel as high as 192 mg/kg
- Cadmium as high as 26.7 mg/kg
- Zinc as high as 3,639 mg/kg
- Copper as high as 1,588 mg/kg

An undated potential hazardous waste site inspection report presents the results of the 1983 Ralston facility sampling listed above. The report also states that additional sludge and groundwater sampling was being done under a consent agreement between EPA and GSD and that the associated analytical results were expected to be received shortly. Moreover, the report states the following regarding the Ralston facility (DCN 052720):

- A potential for groundwater contamination exists because (1) the lagoon has no liners and (2) lagoon sludge is contaminated with PCBs and heavy metals.
- A potential for surface water contamination exists because (1) the lagoon is adjacent to the Grand Calumet River, (2) berms around the lagoon have been observed to be leaking into a marshy area connected to the river, (3) lagoon sludge is contaminated, and (4) there is a possibility of contaminated aquifer discharge to the river.
- A potential for soil contamination under the lagoon exists because sludge in the lagoon is contaminated.

A May 25, 1984, ISBH memorandum notes that the Ralston facility might become an NPL site (DCN 052708).

A September 30, 1986, memorandum from E&E provides the following undated information on the Ralston facility (DCN 052705):

- The State of Indiana and EPA, under the Toxic Substance Control Act (TSCA), filed suit to have GSD proceed with remedial action at the Ralston facility
- EPA entered into a consent agreement with GSD to have additional work done at the Ralston facility in order to define and implement remedial action. Under this agreement, use of the Ralston facility was to cease by May 1987

An October 25, 1991, PA prepared for the Ralston facility by E&E states that a potential exists for migration of hazardous substances from the lagoon to the Grand Calumet River. The lagoon is located in the 100-year flood plain of the Grand Calumet River and is surrounded by a vegetated, earthen levee made of permeable, sandy soil. In addition, the lagoon has no liner. The ability of the levee to contain the contents of the lagoon was questioned by ISBH in 1983 when a GSD facility inspection revealed that (1) lagoon overflow mechanisms were malfunctioning, (2) the lagoon was nearly overflowing the levee, and (3) sludge was seeping into the levee along the north side of the lagoon. In addition, berms around the lagoon had been observed to be leaking into a marshy area connected to the Grand Calumet River. The

lagoon was estimated to contain about 9 tons of PCBs. By May 1987, GSD had agreed to develop an alternative to its sludge disposal in the Ralston facility in response to a suit filed by EPA and the State of Indiana (DCN 052695; DCN 052720).

Solid and Hazardous Waste Management File Room

No pertinent documents for the GSD facility were found in the Solid and Hazardous Waste Management file room.

Water Management

A 1990 pretreatment audit revealed that the GSD facility had been in violation of numerous provisions of its NPDES permit. Many of these violations appeared to be related to industrial discharges causing or contributing to pass-through of wastewater. In addition, EPA and the State of Indiana entered into a consent decree with GSD in October 1992. The consent decree required GSD to implement a remedial program in order to achieve clean closure of the Ralston facility under TSCA and to implement a Grand Calumet River remediation project with a value of at least \$1.7 million (IDEM 1996). Tetra Tech found no information related to these matters in the facility files, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in the Water Management file room.

A 1994 GSD Industrial Pretreatment Department annual report lists the compliance status of significant industrial users of the WWTP as being in the "always compliant," minor noncompliance or significant noncompliance categories (DCN 054428). Significant industrial users listed in the minor and significant noncompliance categories are identified in Table 2-13. The significant industrial users listed as "always compliant" are Roll Center, Inc. (Roll Center), and two Shell Oil Company (Shell Oil) gasoline stations (DCNs 054428, 054443, 054444, and 054445).

TABLE 2-13

SIGNIFICANT INDUSTRIAL USERS OF GSD WWTP IN MINOR AND SIGNIFICANT NONCOMPLIANCE CATEGORIES

Minor Noncompliance		Significant Noncompliance	
Facility	DCN	Facility	DCN
Anderson Development Co.	054435	American Juice	054428
Beaver Oil Company	054428	Chicago Steel Limited	054436
Dixie Dairy Company	054437	Flying "J", Inc.	054438
Georgia-Pacific Corporation	054428	Gary Sanitary Landfill	054439
Northwest Indiana Water Company (formerly, Gary Hobart Water Corporation)	054442	Methodist Hospital - Northlake	054440
U.S. Steel Corporation	054428	Northwest Family Hospital	054441
		Peerless Potato Chips, Inc.	054428
		Truckstops of America	054446

In addition to the significant industrial users identified in Table 2-13, the Chase Street Industrial Center and Indiana Industrial Investments facilities have been cited for noncompliance with regard to discharges to the GSD facility (DCN 054415 and DCN 054418).

A June 14, 1994, letter from IDEM to the GSD facility states that the facility is listed in the 1993 Great Lakes enforcement report as being among the top 10 U.S. contributors of cadmium, chromium, mercury, zinc, and oil and grease to the Great Lakes basin (DCN 052724).

2.23.3 Other Possible PRPs

Other possible PRPs for the AOA identified during Tetra Tech's review of the GSD facility files are presented in Table 2-14. These possible PRPs fall into one of three categories: (1) facilities previously identified by IDEM and sent a PRP notice letter, (2) facilities previously identified by IDEM and addressed in this PRP search report, and (3) facilities that are newly identified possible PRPs.

TABLE 2-14

OTHER POSSIBLE PRPs ASSOCIATED WITH GSD FACILITY

Possible PRP	Pertinent Information	Possible PRP Category
American Juice	Industrial discharger to the GSD facility (DCN 054428)	2.1 ^a
Anderson Development Co.	Industrial discharger to the GSD facility (DCN 054435)	2.4 ^a
Beaver Oil Company	Industrial discharger to the GSD facility (DCN 054428)	2.6 ^a
Chase Street Industrial Center (International Knife and Saw, Inc.; Kenwood Steel Processing, Inc.; and Tinplate Partners International, Inc.)	Industrial discharger to the GSD facility (DCN 054418)	2.8 ^a
Chicago Steel Limited	Industrial discharger to the GSD facility (DCN 054436)	2.10 ^a
City of Gary	Established GSD (IDEM 1996)	Newly identified ^b
Cummins Northern Illinois	Industrial discharger to the GSD facility (DCN 052434)	2.13 ^a
Dixie Dairy Company	Industrial discharger to the GSD facility (DCN 054437)	2.14 ^a
Flying J-J Care	Industrial discharger to the GSD facility (DCN 054438)	Newly identified ^b
Flying "J", Inc.	Industrial discharger to the GSD facility (DCN 054409)	2.19 ^a

TABLE 2-14 (Continued)

OTHER POSSIBLE PRPs ASSOCIATED WITH GSD FACILITY

Possible PRP	Pertinent Information	Possible PRP Category
Gary Public Transportation Corporation	Industrial discharger to the GSD facility (IDEM 1996)	2.21 ^a
Gary Sanitary Landfill	Industrial discharger to the GSD facility (DCN 054439)	2.24 ^a
Georgia-Pacific Corporation	Industrial discharger to the GSD facility (DCN 054428)	PRP notice letter sent ^c
Indiana Industrial Investments, Inc.	Industrial discharger to the GSD facility (DCN 054415)	2.27 ^a
Methodist Hospital - Northlake	Industrial discharger to the GSD facility (DCN 054440)	2.32 ^a
NIPSCO Mitchell Generating Station	Industrial discharger to the GSD facility (IDEM 1996)	2.40 ^a
Northwest Family Hospital	Industrial discharger to the GSD facility (DCN 054441)	2.41 ^a
Northwest Indiana Water Company	Industrial discharger to the GSD facility (DCN 054442)	2.42 ^a
Peerless Potato Chips, Inc.	Industrial discharger to the GSD facility (DCN 054428)	Newly identified ^b
Roll Center, Inc.	Industrial discharger to the GSD facility (DCN 054428)	2.48 ^a
Republic Engineered Steels, Inc.	Industrial discharger to the GSD facility (IDEM 1996)	2.46 ^a
Shell Oil Company Gas Stations	Industrial discharger to the GSD facility (DCN 054428)	2.52 ^a
Truckstops of America	Industrial discharger to the GSD facility (DCN 054446)	2.56 ^a
U.S. Steel Corporation	Industrial discharger to the GSD facility (DCN 054428)	PRP notice letter sent ^c

Notes:

- ^a This other possible PRP was previously identified by IDEM and is addressed in this PRP search report in the section indicated.
- ^b This possible PRP is not on the list of 100 facilities provided by IDEM.
- ^c This possible PRP has previously received a PRP notice letter from IDEM.

2.24 GARY SANITARY LANDFILL, CITY OF GARY

The Gary Sanitary Landfill (GSL) facility is an active sanitary landfill operated by the City of Gary. The landfill accepts nonhazardous municipal solid waste (DCNs 052812 and 052798). According to Indiana Department of Environmental Management v. City of Gary, Cause No. C77-2270, on November 17, 1988, the Lake Circuit Court "ordered the City of Gary to cease accepting waste immediately and to close the landfill within 180 days" (DCN 052798). On December 23, 1988, IDEM and the City of Gary entered into an agreed order containing a closure deadline of December 31, 1989 for the facility (DCN 052798).

The GSL facility is a significant industrial discharger to the GSD treatment plant. GSL received letters of violation from GSD in 1992 for high COD, TSS, and phosphorus levels in facility wastewater discharge. A commissioner's order was issued on August 31, 1995, for facility operational violations. The respondent in this case was Mid-American Waste Systems of Indiana, Inc. A verbal agreement had been reached in the case with the adoption of language pending (IDEM 1996). Tetra Tech found no information related to these matters in the facility files, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in the Water Management file room.

2.24.1 Facility Location

The GSL facility is located at 1900 Burr Street in Gary, Indiana (DCN 052812). This facility is located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996).

2.24.2 Summary of Pertinent Information

The pertinent information presented below on the GSL facility was drawn from documents in the Solid and Hazardous Waste Management and Water Management file rooms.

Environmental Response File Room

No pertinent documents for the GSL facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

A September 19, 1988, court order required the City of Gary to file monthly reports of activities at the GSL facility. These monthly reports were to include the results of groundwater monitoring and are further discussed below (DCN 052781).

A March 1989 monthly report from the City of Gary states that Indiana Waste Systems, Inc., offered to convey a 10-acre strip of its property adjacent to the GSL facility to the City of Gary. Indiana Waste Systems, Inc., alleged contamination of this 10-acre strip by GSL and the City of Gary believed that its acquisition of this strip might enable it to protect Indiana Waste Systems, Inc.'s, property by employing remedial measures less expensive than but as effective as those specified in the September 19, 1988 court order (DCN 052781).

A March 1989 sampling event report states that benzene and 1,2-dichloroethane were present in groundwater samples collected from monitoring wells at the GSL facility (DCN 052750).

Another March 1989 sampling event report states that benzene; 1,1-dichloroethane; and 1,2-dichloroethane were present in groundwater samples collected from monitoring wells at the GSL facility (DCN 052763).

A May 1989 sampling event report states that detectable levels of benzene were present in all groundwater samples collected from monitoring wells at the GSL facility (DCN 052798).

A September 1989 sampling event report states that detectable levels of benzene; 1,2-dichloroethene; 1,1,1-trichloroethane; trichloroethene; and tetrachloroethene were present in groundwater samples collected from monitoring wells at the GSL facility (DCN 052785).

An October 1989 sampling event report states that benzene; ethylbenzene; chlorobenzene; and 1,4-dichlorobenzene were present in groundwater samples collected from monitoring wells at the GSL facility (DCN 052785).

A November 1989 sampling event report states that benzene; ethylbenzene; chlorobenzene; toluene; xylene; 1,2-dichlorobenzene; 1,3-dichlorobenzene; and tetrachloroethane were present in groundwater samples collected from monitoring wells at the GSL facility (DCN 052726).

A January 19, 1994, letter from Mid-American Waste Systems of Indiana, Inc. to IDEM requests elimination of statistical analysis of groundwater data for the GSL facility. The letter notes that groundwater degradation had been identified and addressed with installation of a slurry cutoff wall along the upgradient and sidegradient perimeter of the landfill as well as a downgradient recovery system (DCN 052725).

Water Management File Room

In 1994, GSD listed the GSL facility as a significant industrial user in the significant noncompliance category because of the facility's failure to submit self-monitoring data within 30 days of the due date (DCN 052808).

2.24.3 Other Possible PRPs

In addition to the City of Gary, other possible PRPs for the AOA identified in the GSL facility files are presented in Table 2-15. A summary of the information in the document copies pertinent to GSD is provided in Section 2.23. Beckstein Construction; Congress Enterprises; Indiana Waste Systems, Inc.; and Mid-American Waste Systems of Indiana, Inc. are newly identified possible PRPs.

TABLE 2-15**OTHER POSSIBLE PRPs ASSOCIATED WITH GSL FACILITY**

Possible PRP	Pertinent Information
Beckstein Construction	Landfill contractor at the GSL facility (DCN 052726)
City of Gary	Operated the GSL facility (DCN 052798)
Congress Enterprises	Landfill contractor at the GSL facility (DCNs 052726 and 052750)
Gary Sanitary District	Receives wastewater from the GSL facility (DCN 052808)
Indiana Waste Systems, Inc.	Owns the contaminated property adjacent to the GSL facility (DCN 052781)
Mid-American Waste Systems of Indiana, Inc.	Conducting business as GSL (DCN 052725)

2.25 HARBISON WALKER REFRACTORIES

The operations conducted at the Harbison Walker Refractories (Harbison Walker) facility are not identified in the documents photocopied for the PRP search.

2.25.1 Facility Location

The Harbison Walker facility is located at 5501 Kennedy Avenue in Hammond, Indiana (DCN 052817). This facility is located in Priority Reach C, Cline Avenue to Kennedy Avenue (IDEM 1996).

2.25.2 Summary of Pertinent Information

The pertinent information presented below on the Harbison Walker facility was drawn from documents in the Solid and Hazardous Waste Management and Water Management file rooms.

Environmental Response File Room

No pertinent documents regarding the Harbison Walker facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

On September 23, 1985, the ISBH Compliance Monitoring Section conducted a follow-up closure inspection at the Harbison Walker facility because of issues identified during a May 2, 1985, closure inspection. During the May 2 inspection, the plant representative did not know the process or materials used for a chrome brick etching process. Also, six drums were found in the hazardous waste storage area, and the plant representative stated that the drums were filled with creosote and phenol resin spillage. However, during a telephone conversation with ISBH on May 10, 1985, the plant representative stated that the drums contained priming and refractory oils. During the September 23 inspection, ISBH found that one of the drums actually contained aluminum dust (DCN 052815).

In addition, according to the September 23 inspection memorandum, a tar pitch spill around a tank occurred because of a leaking pipe. The tar pitch had solidified to a thickness of 1 to 2 feet. Also, several box containers were found near the area north of the facility fenceline, which borders the Grand Calumet River. The plant representative stated that the material in the containers was off-specification magnacite product. The area where the boxes were found also appeared to have been used as an open dumping ground for various unidentified materials. The inspection results were communicated to both the ISBH Enforcement Section and the ISBH Plan Review and Permit Section for appropriate review and action (DCN 052815).

Water Management File Room

On March 15, 1995, an IDEM NPDES compliance inspection was conducted at the Harbison Walker facility. The facility had previously obtained NPDES Permit No. IN0000248, which was effective as of December 2, 1986, and expired on December 1, 1991. At the time of the inspection, a permit renewal letter had been submitted to IDEM. The Harbison Walker facility discharges its sewage to the Hammond publicly owned treatment works (DCN 052818).

The facility outfalls are designated as 001 for noncontact cooling water and 002 for noncontact cooling water and storm water. According to the NPDES compliance inspection report, oil and grease exceedances had occurred in facility discharges three times, and Harbison Walker had not notified IDEM of the exceedances. Also, an open storm water drainage ditch was found north of the facility near the Grand Calumet River. The inspection report indicates that because of the facility's industrial activities and the presence of the storm water drainage ditch, Harbison Walker would need to submit a storm water permit application (DCN 052818).

Another IDEM NPDES compliance inspection was conducted at the Harbison Walker facility on February 23, 1996. The NPDES compliance inspection report indicates that no oil and grease exceedances in facility discharges had been reported between September and December 1995. A stockpile of reclaimed or reworked materials was found outdoors to the east of the facility manufacturing plant. The materials were stored on concrete slabs but were not covered. According to the inspection report, a potential existed for storm water runoff from the materials because no diked structures were present at the facility (DCN 052817).

2.25.3 Other Possible PRPs

No other possible PRPs for the AOA were identified in the Harbison Walker facility files.

2.26 HOUSE'S JUNK YARD, ARNOLD HOUSE

The House's Junk Yard facility is a junkyard that salvages parts from automobiles and trucks for resale. Facility salvaging activities are estimated to have begun in the 1960s. Debris on site includes tires, scrap metal, drummed wastes, and domestic refuse. According to an expanded site inspection (ESI) report prepared by Roy F. Weston, Inc. (WESTON), in February 1993, there are no records indicating what waste materials have been dumped at the facility, where the waste came from, or who brought the waste to the facility (DCN 052820). According to an Emergency & Remedial Response Information Systems (ERRIS) executive summary, the House's Junk Yard facility is also referred to as the Gary Junk Yard (DCN 052885). The current owner and operator of the facility, according to the 1993 ESI report, is Arnold House (DCN 052827).

2.26.1 Facility Location

The House's Junk Yard facility is located at the intersection of Clark Street and Birch Road in Gary, Indiana (DCN 052826). The Grand Calumet River is about 1,600 feet south of the facility (DCN 052820). This facility is located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996).

2.26.2 Summary of Pertinent Information

The pertinent information presented below on the House's Junk Yard facility was drawn from documents in the Environmental Response file room.

Environmental Response File Room

The House's Junk Yard facility covers about 2 acres. An unnamed drainage ditch forms the north-northeast boundary of the facility. The unnamed ditch drains to the southeast from the facility into an area of wetlands bordering the Grand Calumet River. The soil in the area is sandy and highly permeable. Soils under the facility are highly varied and include fine lake silt and clay, paludal deposits of muck and peat, sand and gravel outwash deposits, and clay-rich till units of varying thickness and areal distribution (DCN 052820). According to a site inspection report, "There is a potential for contaminants in the soil on-site to leach through the highly-permeable unconsolidated deposits into the shallow Calumet aquifer" (DCN 052881).

On September 11, 1985, E&E spoke with Adeline Cooke concerning the House's Junk Yard facility. Mrs. Cooke stated that the facility had been a junkyard for a number of years (the facility was owned by the Cooke family for about 40 years [DCN 052877]) and that its first operator had been Thomas Greene. Mrs. Cooke regained the facility from Mr. Greene in 1982 and placed it in a trust administered by the National Bank of Hammond. Mrs. Cooke leased the facility property to Arnold House, who continued to operate the facility as a junkyard. The facility is now owned and operated by Mr. House, who acquired the facility under the Homestead Act. According to Mrs. Cooke, several houses on the facility property were demolished in the early 1980s (DCN 052820).

On May 3, 1984, a site assessment was conducted at the House's Junk Yard facility by EPA's contracted technical assistance team (TAT), WESTON (DCN 052820). According to the potential hazardous waste site PA, analysis of samples collected during the site assessment confirmed contamination of surface water, soil, and sediment. Contaminants found in the drainage ditch water included benzene; methylene chloride; 1,1-dichloroethane; and cyanide (DCN 052885). Soil samples contained heavy metals and methylene chloride, and river embankment soil samples contained "very high" levels of volatile and semivolatile organics and Aroclor 1260. Sediment samples collected from drainage tiles and the Grand Calumet River contained volatile and semivolatile organics, cyanide, and heavy metals at levels greater than three times the background levels (DCN 052820). During the site assessment, about 30 empty drums were found near contaminated soil (DCN 052885). The EPA TAT concluded that (1) hazardous materials might have been illegally dumped at the facility, (2) the potential for groundwater contamination from the surface-deposited wastes was high, and (3) analyses of samples collected near the facility indicated off-site migration of contaminants. The EPA TAT collected additional samples at the facility on December 17, 1984 (DCN 052877).

On July 1, 1985, EPA Region 5 prepared a PA for the House's Junk Yard facility that contained information from the May 3, 1984, site assessment. The PA states that soil and sediment sample analytical results showed "extremely high" levels of organic contaminants, including chlorinated volatiles, nonchlorinated volatiles, polynuclear aromatic hydrocarbons (PAH), and one PCB species; also, "extremely high" levels of contaminants were present in river sediment samples. Another PA prepared by E&E on September 11, 1985, recommends an EPA inspection and Hazard Ranking System scoring of the facility (DCN 052820).

On February 4, 1987, E&E conducted a screening site inspection at the House's Junk Yard facility. An interview with the facility owner was conducted, and three on-site soil and sediment samples and one background sample were collected. The facility owner stated that much of the debris found in the unnamed ditch was dumped there illegally. About 20 drums were observed on site; some drums were broken with their contents spilled on the ground (DCN 052820). Soil samples collected during the screening site inspection indicated that soil contamination was spreading. Contaminants detected in the soil samples included 1,1,1-trichloroethane; chloroform; bis(2-ethylhexyl) phthalate; phenanthrene; and pyrene (DCN 052880). On-site soil samples contained volatile and semivolatile organics, cyanide, and heavy metals at levels greater than three times the background levels (DCN 052820).

An undated potential hazardous waste site, site inspection report screening was completed by EPA for the House's Junk Yard facility. Investigations mentioned in the report include the E&E site inspection of February 4, 1987, and a site assessment conducted by the EPA TAT in November 1984. According to the potential hazardous waste site, site inspection report, the facility exhibited poor operating practices. The facility owner was interviewed, and he said that illegal dumping had occurred at the facility but that he did not know who dumped the wastes. He also stated that illegal dumping had occurred as recently as 1 week before the site inspection. EPA TAT sample analytical results indicated "heavy" contamination of the sediment on drainage tiles that run below the facility to the bank of the unnamed ditch. The report states that EPA TAT sample results coupled with FIT sample results show a correlation between on-site soil contamination and river sediment and water contamination. According to the potential hazardous waste site, site inspection report, about 20 55-gallon drums were observed on site, and about 10 drums had leaked and spilled their solid and granulated contents onto the surrounding ground. Additional drums that appeared to have been buried at one time were found near the bank of the unnamed ditch. Also, the inspection report states that a tanker trailer that had contained fuel oil was found at the facility. According to the inspection report, no liners, diking, or barriers were present to contain leachate at the facility; no migration pathways to Lake Michigan were present; and potentially contaminated runoff from the facility could enter sewers and storm drains (DCN 052880).

After conducting an off-site reconnaissance inspection on May 21, 1991, E&E prepared a PA for the House's Junk Yard facility on September 4, 1991 (DCN 052820). Drums were observed during the inspection. The PA states that the results of the E&E and EPA TAT inspections indicate potential contamination of surface water in the unnamed drainage ditch and of soil over an unknown portion of the facility. In addition, open dumping had occurred in much of the area surrounding the facility. The facility might have contributed to groundwater contamination in the surrounding area that resulted in the closing of nearby residential wells. At the time of the PA, no apparent attempts to cleanup or secure the facility had been made (DCN 052877).

On July 26, 1991, a groundwater study of the Gary, Indiana, area was conducted by E&E. The purpose of the study was to determine the source, magnitude, and migration pathways of cyanide contamination

detected in groundwater near the Midwest Industrial Waste Disposal Company, Inc., facility (which is 1 mile northwest of the House's Junk Yard facility). During the study, four sets of monitoring wells were installed at and adjacent to the House's Junk Yard facility. According to the 1993 ESI report, subsurface soil samples collected at the facility during the groundwater study contained low levels of volatile and semivolatile organics, cyanide, and metals. Sample analytical results for a groundwater sampling event conducted in January 1988 indicate that volatile organics and heavy metals were present in shallow wells at the facility (DCN 052820).

On April 21, 1992, WESTON conducted a site reconnaissance visit to the House's Junk Yard facility. Pertinent observations made during the site reconnaissance visit are summarized below (DCN 052820).

- The facility was active and contained junked automobiles, piles of tires, and metal debris.
- Soil staining and possibly stressed vegetation were present in active areas of the facility, such as the junked automobile area and the tire pile area.
- Empty drums were present in several locations.

According to the 1993 ESI report, WESTON reached the following conclusions concerning the facility (DCN 052820):

- Volatile and semivolatile organic compounds, pesticides, PCBs, and heavy metals were present in unnamed drainage ditch sediment.
- Heavy metals were the primary contaminants in the sediment.
- Soils contained chlorinated solvents, BTEX compounds, polynuclear aromatic compounds, PCBs, heavy metals, and cyanide.
- The shallow surficial aquifer below the facility contained an organic contaminant plume that was moving westward toward the Samocki Brothers Trucking Company facility.
- The plume extended below the south portion of the facility.
- The major constituents of the plume were BTEX compounds.
- The most contaminated sediment was located in the middle of the facility property.

During multimedia inspections conducted in 1991 and 1995, open bags of insulation, construction demolition waste, tires, leaking tanks of tar, and auto shredder fluff were found dumped on property owned by Arnold House; Georgia-Pacific; and A. Metz, Inc. Analytical results for samples collected in October 1995 included PCB levels above 50 ppm. Also, TCLP results for auto fluff samples collected in December 1995 indicated that the waste was hazardous for lead (D008). A conference notice of violation (NOV) was being reviewed in 1996 (IDEM 1996).

Solid and Hazardous Waste Management File Room

No documents for the House's Junk Yard facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

No documents for the House's Junk Yard facility were found in the Water Management file room, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in this file room.

2.26.3 Other Possible PRPs

The parties listed in Table 2-16 were identified as other possible PRPs for the AOA during Tetra Tech's review of the House's Junk Yard facility files (DCN 052820). A. Metz, Inc., was included in the original list of 100 facilities provided by IDEM to Tetra Tech; however, no pertinent documents regarding the A. Metz, Inc., facility were found in the IDEM file rooms. IDEM has already issued a PRP notice letter to Georgia-Pacific (IDEM 1996). Except for A. Metz, Inc. and Georgia-Pacific, the parties listed in Table 2-16 are newly identified possible PRPs.

TABLE 2-16

OTHER POSSIBLE PRPs ASSOCIATED WITH HOUSE'S JUNK YARD FACILITY

Possible PRP	Pertinent Information
A. Metz, Inc.	Inspection indicated that wastes were dumped on a property owned by A. Metz, Inc. (IDEM 1996)
Arnold House	Current owner and operator of the facility (DCN 052820)
Cooke Family	Owners of the facility for 40 years (DCN 052820)
Georgia-Pacific	Inspection indicated that wastes were dumped on a property owned by Georgia-Pacific (IDEM 1996)
Thomas Greene	Resided and illegally dumped waste on the facility property (DCN 052877)

2.27 INDIANA INDUSTRIAL INVESTMENTS

The operations conducted at the Indiana Industrial Investments facility are not identified in the documents photocopied for the PRP search.

2.27.1 Facility Location

The Indiana Industrial Investments facility is located at 86 North Bridge Street in Gary, Indiana (DCN 052893). This facility is an industrial discharger to GSD located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996).

2.27.2 Summary of Pertinent Information

The pertinent information presented below on the Indiana Industrial Investments facility was drawn from documents in the Water Management file room.

Environmental Response File Room

No documents for the Indiana Industrial Investments facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

No documents for the Indiana Industrial Investments facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

On January 26, 1995, a show-cause hearing was held at GSD concerning violations at the Indiana Industrial Investments facility. According to the findings of the show-cause hearing, the facility failed to comply with GSD Sewer Use Ordinance No. 6101, Division II, Section 2, Paragraph A 5(h), which states that it is unlawful to discharge any wastewater that contains floatable oils, fat, or grease. The facility was in noncompliance in September, October, and November 1994 and in January 1995. As a result, Indiana Industrial Investments was required to pay penalties for the violations within 30 days of issuance of a demand letter dated February 24, 1995 (DCN 052893).

On February 11, 1997, an IDEM NPDES facility inspection was conducted at the Indiana Industrial Investments facility. At the time of the inspection, the facility did not have an NPDES permit. According to the inspection report, this was a follow-up inspection performed to address a noncompliance issue concerning unpermitted discharge of untreated sewage from the facility to the Grand Calumet River. The facility was given 30 days from the inspection date to identify its options for coming into compliance. Options included separating sewers to discharge sanitary water to the GSD treatment plant and storm water to the Grand Calumet River, blocking off water overflow, or leaving the sewers combined and obtaining a permit (DCN 052891).

2.27.3 Other Possible PRPs

GSD was identified as another possible PRP for the AOA during Tetra Tech's review of the Indiana Industrial Investments facility files (DCN 052893). The facility discharges its wastewater to the GSD treatment plant. A summary of the information in the document copies pertinent to GSD is provided in Section 2.23.

2.28 INDUSTRIAL DISPOSAL CORP.

The Industrial Disposal Corp. (Industrial Disposal) facility is a privately owned landfill that operated from 1976 to 1978 (DCN 052897). Filling material used at the facility included foundry sand, concrete, and brick. Between 5,000 and 10,000 gallons per day of seepage and runoff water was discharged from the facility 2 to 3 days per week (IDEM 1996). Laidlaw Waste Systems owns the facility property (DCN 054466).

2.28.1 Facility Location

The Industrial Disposal facility is located at 333 North Clark Road in East Chicago, Indiana. The facility lies on the south bank of the Grand Calumet River east of Cline Avenue. This facility is located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996). According to letterhead stationery copied by Tetra Tech, Industrial Disposal is located at 2000 Gary Avenue in East Chicago, Indiana (DCN 052899). Also, according to a PA summary, Industrial Disposal has a solid fill site, formerly called Site #10, at the intersection of Cline Avenue and the Indiana Toll Road in Gary, Indiana (EPA ID No. IND 980 500 540) (DCN 052896).

2.28.2 Summary of Pertinent Information

The pertinent information presented below on the Industrial Disposal facility was drawn from documents in the Environmental Response file room.

Environmental Response File Room

On July 27, 1982, a spill occurred on Chicago Avenue in East Chicago, Indiana, as a result of a vehicular accident. The file documents photocopied by Tetra Tech do not indicate what type of material was spilled or the quantity of the spill. However, a letter dated September 2, 1982, from Industrial Disposal (on letterhead stationery with an address of 2000 Gary Avenue, East Chicago, Indiana) to the ISBH states that the spill was cleaned up by Industrial Disposal personnel and that the spill materials were transported to Wheeler Landfill (DCN 052899).

According to a February 6, 1984, potential hazardous waste site PA report, "potential" groundwater contamination exists at the Industrial Disposal solid fill site, formerly called Site #10, at the intersection of Cline Avenue and the Indiana Toll Road in Gary, Indiana. The water table at this site is about 2 feet bgs. The Grand Calumet River is adjacent to the north boundary of the site. Therefore, there is a potential for migration of groundwater contamination to the river. In addition, site soils may have been contaminated as a result of illegal dumping of chemicals and wastewater treatment sludges. The "potential" damage to site flora and fauna is also noted in the PA report (DCN 052897).

Solid and Hazardous Waste Management File Room

The Industrial Disposal facility files were not available in the Solid and Hazardous Waste Management file room when Tetra Tech conducted its file review or on subsequent occasions while Tetra Tech was preparing this report.

According to a letter found in the U.S. Reduction Company facility files, U.S. Reduction Company wrote to ISBH on December 6, 1976, and indicated that the waste from U.S. Reduction is transported and disposed of by Industrial Disposal (DCN 054468).

Water Management File Room

The Industrial Disposal facility acquired an NPDES permit in the early 1980s to discharge untreated wastewater to the Grand Calumet River. The facility no longer has an NPDES permit (IDEM 1996).

No documents for the Industrial Disposal facility were found in the Water Management file room, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in this file room.

2.28.3 Other Possible PRPs

Laidlaw Waste Systems and U.S. Reduction Company were identified as other possible PRPs for the AOA during Tetra Tech's review of the Industrial Disposal facility files. In a notice of loss report submitted by Industrial Waste Systems to Aetna Insurance Company concerning a vehicular accident, the insured party is identified as Laidlaw Waste Systems (Industrial Disposal) (DCN 052900). A 1984 PA report indicates that the owner of the Industrial Disposal facility is Laidlaw Waste Systems (DCN 054466). Laidlaw Waste Systems is a newly identified possible PRP. Industrial Disposal transports and disposes waste from U.S. Reduction Company (DCN 054468). A summary of the information in the document copies pertinent to U.S. Reduction Company is provided in section 2.60.

2.29 INDUSTRIAL SCRAP CORPORATION

The operations conducted at the Industrial Scrap Corporation (Industrial Scrap) facility are not identified in the documents photocopied for the PRP search.

2.29.1 Facility Location

The Industrial Scrap facility is located at 425 West 152nd Street in East Chicago, Indiana (DCN 052902). This facility is located in Priority Reach E, the fork of the East-West Branch of the Ship Canal to the west end of Roxana Marsh (IDEM 1996).

2.29.2 Summary of Pertinent Information

The pertinent information presented below on the Industrial Scrap facility was drawn from documents in the Environmental Response file room.

Environmental Response File Room

On November 21, 1990, chlorine spilled from a container at the Industrial Scrap facility. CMC Emergency Response (CMC) of Portage, Indiana, was contracted to clean up the spill and to inspect four containers in a scrap pile on site. Three containers had no plugs or valves and were empty; one container had plugs and valves and appeared to be filled with sulfur dioxide. Industrial Scrap personnel moved the containers from the scrap pile to a holding area at the facility. CMC neutralized the acidic water and soil around the scrap pile and a scrap shredder that was affected by the chlorine spill. After the spill, a representative of an unspecified chemical company in Kingsbury, Indiana, visited the facility and identified the contents of the containers being investigated as chlorine and sulfur dioxide. This representative would not say whether the containers belonged to the chemical company (DCN 052911).

On May 6, 1997, R.W. Collins and Corporate Engineering, Inc. (CEI), removed a partly buried, 8,000-gallon diesel storage tank from land owned by Industrial Scrap. Industrial Scrap uses this area and its building for minor repairs and welding. The Grand Calumet River is about 110 feet south of this area, and the Indiana Harbor Ship Canal is about 190 feet to the east. Soils in the tank excavation were loosely packed, light-colored sands. Groundwater was encountered between 2 and 5 feet bgs. Wells lying about 2,000 feet south-southeast of the area are used to provide city water (DCN 052904).

According to an incident report prepared by CEI, the tank removed was intact and had not held product for about 30 years. Samples were collected after the tank was removed. The incident report states that one sidewall sample "failed." However, no visual signs of contamination were observed in the excavation. On June 9, 1997, groundwater samples collected were found to have "no results." On June 26, 1997, a soil sample was collected near the road adjacent to the tank excavation; analytical results indicated that contamination was present. According to the incident report, the contamination was believed to be the result of tank overfills in the late 1960s, and the impacted area was estimated to be less than 10 cubic yards in size. On July 7, 1997, about 8 cubic yards of source material was excavated from the impacted area, and four additional soil samples were collected. The analytical results indicated "minor" contamination. As a result, soil along the west side of the tank excavation (toward the road) was excavated down to the groundwater level. The excavated soil, which totaled about 25 cubic yards, was stockpiled on a liner on site. According to the incident report, the soil was to be treated using Bio-Solve and commercially prepared micro-organisms; after treatment, the soil was to be returned to the excavated area. On July 23, 1997, three additional soil samples were collected; however, the analytical results were not found in the facility documents photocopied (DCN 052904).

Solid and Hazardous Waste Management File Room

No pertinent documents regarding the Industrial Scrap facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

No documents for the Industrial Scrap facility were found in the Water Management file room, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in this file room.

2.29.3 Other Possible PRPs

The unspecified chemical company in Kingsbury, Indiana, was identified as another possible PRP for the AOA during Tetra Tech's review of the Industrial Scrap facility files. A representative of the chemical company identified the contents of the containers being investigated after a spill at the facility but would not say whether the containers belonged to the chemical company (DCN 052911). The unspecified chemical company in Kingsbury, Indiana, is a newly identified possible PRP.

2.30 INLAND DETROIT DIESEL-ALLISON

The operations conducted at the Inland Detroit Diesel-Allison (Inland Detroit) facility are not identified in the documents photocopied for the PRP search.

2.30.1 Facility Location

The Inland Detroit facility is located at 2601 E. 15th Avenue in Gary, Indiana (DCN 052921). This facility is an industrial discharger to GSD located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996). According to a letter from Inland Detroit to IEPA, Inland Detroit has another facility at 500 South Lombard Road in Addison, Illinois (DCN 052921).

2.30.2 Summary of Pertinent Information

The pertinent information presented below on the Inland Detroit facility was drawn from documents in the Solid and Hazardous Waste Management file room.

Environmental Response File Room

No documents for the Inland Detroit facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

On January 18, 1993, Inland Detroit sent a letter to IEPA notifying the agency of a change in company ownership. The letter states that as of December 1, 1993, Western Detroit Diesel-Allison, which was located at the Gary, Indiana, facility, would become Inland Detroit Diesel-Allison. In the letter, Inland Detroit requested that the generator identification numbers for its facilities in Illinois and Indiana be reassigned. The facility in Gary, Indiana, is assigned IEPA ID No. 9180896587 and EPA ID No. IND 083 085 522 (DCN 052921).

Water Management File Room

No documents for the Inland Detroit facility were found in the Water Management file room, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in this file room.

2.30.3 Other Possible PRPs

Western Detroit Diesel-Allison was identified as another possible PRP for the AOA during Tetra Tech's review of the Inland Detroit facility files. Prior to 1993, Inland Detroit was Western Detroit Diesel-Allison (DCN 052921). Western Detroit Diesel-Allison is a newly identified possible PRP.

2.31 METAL RECOVERY INDUSTRIES, INC.

The operations conducted at the Metal Recovery Industries, Inc. (MRI) facility are not identified in the documents photocopied for the PRP search. In an IDEM memorandum dated June 29, 1995, MRI is also referred to as ASK Shredders (DCN 052922). Additional information found in the facility files concerning ASK Shredders is presented in Section 2.5.

2.31.1 Facility Location

The documents photocopied do not indicate where the MRI facility is located. However, the documents photocopied indicate that the ASK Shredders facility is located at 415 E. 151st Street in East Chicago, Indiana (DCN 054470). This facility is located in Priority Reach D, Kennedy Avenue to 151st Street (IDEM 1996).

2.31.2 Summary of Pertinent Information

The pertinent information presented below on the MRI facility was drawn from documents in the Solid and Hazardous Waste Management file room.

Environmental Response File Room

No documents for the MRI facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

Refer to Section 2.5.2 for information on the MRI (ASK Shredders) facility found in the Solid and Hazardous Waste Management file room.

Water Management File Room

No documents for the MRI facility were found in the Water Management file room, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in this file room.

2.31.3 Other Possible PRPs

ASK Shredders was identified as another possible PRP for the AOA during Tetra Tech's review of the MRI facility files (DCN 052922). MRI is also referred to as ASK Shredders in the facility files, but the relationship between MRI and ASK Shredders is not described. A summary of the information in the document copies pertinent to ASK Shredders is provided in Section 2.5.

2.32 METHODIST HOSPITAL-NORTHLAKE

The Methodist Hospital-Northlake (Methodist Hospital) facility is a general health care provider that also conducts laundry operations (IDEM 1996).

2.32.1 Facility Location

The Methodist Hospital facility is located at 600 Grant Street in Gary, Indiana (DCN 052964). This facility is located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996).

2.32.2 Summary of Pertinent Information

The pertinent information presented below on the Methodist Hospital facility was drawn from documents in the Environmental Response and Water Management file rooms.

Environmental Response File Room

The Methodist Hospital facility has three USTs on site: one 12,000-gallon UST; one 5,000-gallon UST; and one 2,000-gallon UST. All three tanks contain No. 2 heating oil. Prior to 1985, the USTs contained No. 5 heating oil. On December 1, 1993, Mankoff, Inc., a contractor for Methodist Hospital, completed a Phase I soil boring investigation report for the facility. The investigation was conducted on November 15, 1993, to determine whether a release had occurred from the 5,000-gallon UST and to help delineate a suspected contaminant plume. Five soil samples were collected. According to the investigation report, sample analytical results and field observations indicated a release from the 5,000-gallon UST; furthermore, significant levels of petroleum contamination had migrated 15 to 20 feet north of the UST toward the on-site Administration Building. The amount of No. 5 heating oil released is unknown. The Methodist Hospital facility was assigned IDEM Incident No. 9311539 (DCN 052938).

United Environmental Consultants, Inc. (United), and Mankoff, Inc., initiated a Phase II subsurface investigation at the Methodist Hospital facility on January 4, 1994. Five soil samples were collected from five soil borings. According to the Phase II subsurface investigation report, three soil borings exhibited soil staining and strong hydrocarbon odors. Sample analytical results indicated that total petroleum hydrocarbon (TPH) constituents at 35,000 to 68,000 parts per million (ppm) were present in three soil borings, and another soil boring sample had a TPH level of 110 ppm (DCN 052938).

The Phase I and II investigations revealed that the soil under the Methodist Hospital facility consists of medium-grained, well-sorted, yellow sand to about 9 feet bgs. This soil is underlain by a medium-grained, well-sorted, tan to light brown sand horizon extending to about 19 feet bgs. During the investigations, water was encountered at about 11 feet bgs (DCN 052938).

On March 17, 1994, United and Mankoff, Inc., initiated a Phase III groundwater investigation at the Methodist Hospital facility. The investigation included drilling and sampling four additional soil borings and installing monitoring wells in the soil borings. Analytical results indicated that TPH was not detected at levels above laboratory practical quantitation limits (PQL) in the four soil samples. According to the Phase III groundwater investigation report, the sampling results indicated that hydrocarbons were generally not present in soil in the nonsaturated zone. On March 18, 1994, the four monitoring wells were sampled. Analytical results indicated that BTEX constituents were not present at levels above laboratory PQLs in the groundwater samples (DCN 052923).

According to the Phase III groundwater investigation report, United concluded that two distinct types of hydrocarbon contamination might exist at the Methodist Hospital facility: an absorbed phase on soil and backfill particles and a dissolved phase in the shallow groundwater regime. Impacted soils stained with No. 5 heating oil appeared to be localized around the USTs, and groundwater appeared to have only minor

dissolved hydrocarbon impacts. According to the Phase III groundwater investigation report, a corrective action remediation plan was to be developed based on the findings of the Phase II and III investigations (DCN 052923).

Solid and Hazardous Waste Management File Room

No pertinent documents regarding the Methodist Hospital facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

In 1992, Methodist Hospital was issued letters of violation by GSD for high COD, BOD, TSS, and phosphorus levels in facility wastewater discharge. One process at the facility that may negatively affect its discharge to GSD is the laundry operation (IDEM 1996). Tetra Tech found no information related to this matter in the files, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in the Water Management file room.

The Methodist Hospital facility is a significant industrial user that discharges to the GSD treatment plant. In the 1994 GSD annual report, the facility is listed in the category of significant noncompliance industrial user because of its failure to provide self-monitoring data within 30 days of the due date (DCN 052964).

2.32.3 Other Possible PRPs

GSD was identified as another possible PRP for the AOA during Tetra Tech's review of the Methodist Hospital facility files (DCN 052964). The Methodist Hospital facility is a significant industrial user that discharges wastewater to the GSD treatment plant. A summary of the information in the document copies pertinent to GSD is provided in Section 2.23.

2.33 MID-CONTINENTAL COKE COMPANY

The Mid-Continental Coke Company (Mid-Continental) facility is a coke screening facility located on at least 8 acres of land. The facility began operating in 1973 (DCN 052971).

2.33.1 Facility Location

The Mid-Continental facility is located at 370 North Clark Road in Gary, Indiana. The Grand Calumet River is less than 0.5 mile south of the facility (DCN 052971). The facility is located in Priority Reach H, Columbus Drive to the Railroad Overpass and the Lake George Branch of the Indiana Harbor Ship Canal (IDEM 1996).

2.33.2 Summary of Pertinent Information

The pertinent information presented below on the Mid-Continental facility was drawn from documents in the Environmental Response file room.

Environmental Response File Room

At the Mid-Continental facility, coke is crushed, sieved, and separated using a vibration method and is then stored in on-site piles until it is shipped off site. During a PA conducted in September 1991, E&E found that the coke piles rested directly on soil without a liner or other containment. Heavy metals potentially present in the coke include arsenic, lead, and mercury. Coke leachate could also contain sulfuric acid, cyanide, and polycyclic aromatic hydrocarbons. In its PA report, E&E suggests that a potential existed for the heavy metals and acids in the coke piles to leach to groundwater. The water table is about 10 to 12 feet bgs with a layer of sand and gravel overlying it. The direction of groundwater discharge is unknown, but according to E&E, a potential exists for hazardous substances to migrate from the facility into the Grand Calumet River and Lake Michigan. Surface water runoff from the facility migrates to the Grand Calumet River via drainage ditches bordering two sides of the facility (DCN 052971).

Solid and Hazardous Waste Management File Room

No documents for the Mid-Continental facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

No documents for the Mid-Continental facility were found in the Water Management file room, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in this file room.

2.33.3 Other Possible PRPs

No other possible PRPs for the AOA were identified in the Mid-Continental facility files.

2.34 MID-WEST FLAME HARDENING

The Mid-West Flame Hardening (Mid-West Flame) facility's primary operations include heat treating and hardening of finished and semifinished steel parts. A synthetic quenchant is used in these processes. Other facility activities include contact spray cooling and contact quench cooling (IDEM 1996).

2.34.1 Facility Location

The Mid-West Flame facility is located at 500 West 150th Street in East Chicago, Indiana. This facility is located in Priority Reach E, the fork of the East-West Branch of the Ship Canal to the west end of Roxana Marsh (IDEM 1996).

2.34.2 Summary of Pertinent Information

The pertinent information presented below on the Mid-West Flame facility was drawn from documents in the Water Management file room.

Environmental Response File Room

No documents for the Mid-West Flame facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

No documents for the Mid-West Flame facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

The Mid-West Flame facility discharges its wastewater to the ECSD treatment plant. ECSD cited Mid-West Flame for noncompliance involving oil and grease levels in its wastewater discharge several times from 1988 to 1993. In 1993, the facility was cited for significant noncompliance involving copper levels in its wastewater discharge (IDEM 1996). Tetra Tech found no information related to these incidents in the facility files, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in the Water Management file room.

According to an ECSD industrial compliance status report covering data collected from October 1, 1994, to March 31, 1995, the Mid-West Flame facility was issued a notice of violation involving oil and grease levels in its wastewater discharge. Upon investigation, ECSD determined that Mid-West Flame's pretreatment facility was functioning properly, so ECSD concluded that the violation was a one-time occurrence (DCN 052973).

The Mid-West Flame facility was in "total compliance" according to ECSD Industrial Compliance Status Reports dated January 25, 1996 (DCN 054498), April 25, 1996 (DCN 054494), and July 25, 1996 (DCN 054490), January 23, 1997 (DCN 054486), April 25, 1997 (DCN 054481), July 24, 1997 (DCN 054477), and October 23, 1997 (DCN 054473).

2.34.3 Other Possible PRPs

ECSD was identified as another possible PRP for the AOA during Tetra Tech's review of the Mid-West Flame facility files (DCN 052973). The Mid-West Flame facility discharges its wastewater to the ECSD treatment plant. A summary of the information in the document copies pertinent to ECSD is provided in Section 2.16.

2.35 MILLER AND COMPANY

The operations conducted at the Miller and Company (Miller) facility are not identified in the documents photocopied for the PRP search.

2.35.1 Facility Location

The Miller facility is located at 1225 Martin Luther King Drive in Gary, Indiana (DCN 052975). This facility is an industrial discharger to GSD located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996). According to an IDEM letter dated December 9, 1996, an inspection revealed that Miller no longer operates the facility (DCN 052975). The facility files do not indicate where Miller moved its operations; however, a Miller letter dated February 3, 1997, indicates that Miller sold the facility on July 25, 1995 (DCN 052975).

2.35.2 Summary of Pertinent Information

The pertinent information presented below on the Miller facility was drawn from documents in the Solid and Hazardous Waste Management file room.

Environmental Response File Room

No documents for the Miller facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

On November 1, 1996, IDEM conducted a compliance evaluation inspection at the Miller facility. In a letter dated December 9, 1996, from IDEM to Miller, IDEM states that, based on the inspection results, (1) Miller apparently no longer conducts business at this facility location and (2) all hazardous waste has apparently been removed (DCN 052975). Miller sent IDEM a letter dated February 3, 1997, indicating that the facility was sold on July 25, 1995. The letter also states that Miller does not own any other facility in Indiana and therefore requests that Miller be removed from the "Hazardous Waste Management System" in Indiana (DCN 052975).

Water Management File Room

No documents for the Miller facility were found in the Water Management file room, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in this file room.

2.35.3 Other Possible PRPs

No other possible PRPs for the AOA were identified in the Miller facility files.

2.36 NATIONAL PROCESSING CORP.

The operations conducted at the National Processing Corp. facility are not identified in the documents photocopied for the PRP search.

2.36.1 Facility Location

The National Processing Corp. facility is an industrial discharger to the ECSD, which is located in Priority Reach E, the fork of the East-West Branch of the Indiana Harbor Ship Canal to the west end of Roxana Marsh (IDEM 1996). The location of the facility is not identified in the documents photocopied for the PRP search.

2.36.2 Summary of Pertinent Information

The pertinent information presented below on the National Processing Corp. facility was drawn from documents in the ECSD file in the Water Management file room.

Environmental Response File Room

No documents for the National Processing Corp. facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

No pertinent documents regarding the National Processing Corp. facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

The National Processing Corp. facility is an industrial discharger of wastewater to the ECSD treatment plant. The National Processing Corp. facility was in total compliance according to ECSD industrial compliance status reports dated March 31, 1995 (DCN 054531); January 25, 1996 (DCN 054527); April 25, 1996 (DCN 054523); July 25, 1996 (DCN 054519); January 23, 1997 (DCN 054515); April 25, 1997 (DCN 054510); July 24, 1997 (DCN 054506); and October 23, 1997 (DCN 054502).

2.36.3 Other Possible PRPs

ECSD was identified as another possible PRP for the AOA during Tetra Tech's review of the National Processing Corp. facility files (DCN 054531). A summary of the information in the document copies pertinent to ECSD is provided in Section 2.16.

2.37 NATIONAL RECOVERY SYSTEMS

The National Recovery Systems (NRS) facility processes basic oxygen furnace (BOF) "sloppy slag" generated by Inland Steel Company (Inland Steel) (DCN 052978).

2.37.1 Facility Location

The NRS facility is located at 5222 Indianapolis Boulevard in East Chicago, Indiana. The facility is located on the north shore of the Grand Calumet River just west of Indianapolis Boulevard (DCN 052978). This facility is located in Priority Reach E, the fork of the East-West Branch of the Ship Canal to the west end of Roxana Marsh (IDEM 1996).

2.37.2 Summary of Pertinent Information

The pertinent information presented below on the NRS facility was drawn from documents in the Water Management file room.

Environmental Response File Room

No documents for the NRS facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

No documents for the NRS facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

On September 6, 1995, an NPDES compliance inspection of the NRS facility was conducted by IDEM. According to the inspection report, the NRS facility processes BOF "sloppy slag" generated by Inland Steel. Inland Steel slag is transported to the NRS facility, where it is scalped and screened to remove debris. The debris is then sent back to Inland Steel for disposal. At the NRS facility, reclaimed iron compounds are mixed with lime and other materials such as fluorspar and molasses (DCN 052978).

The inspection report notes that the storage, processing, and production practices of the NRS facility were in violation of the Indiana Storm Water Rule in 327 IAC 15-6, Indiana Code (IC) 13-7-4, and air emission regulations in 326 IAC 6-4-1 and 2. The report also states the following: "These practices were adversely impacting or had the potential to adversely impact the water quality of the Grand Calumet River. The facility will need to improve their handling and production practices in an effort to reduce and/or eliminate discharge of polluted material to the GCR [Grand Calumet River]." In addition, the following violations were observed during the inspection (DCN 052978):

- Runoff channels discharging to the Grand Calumet River
- Materials stored improperly
- Fugitive dust emissions

On August 17, 1995, during river surveillance work, a film of white dust was observed on the surface of the Grand Calumet River adjacent to the NRS facility. According to the inspection report, fugitive dust emissions observed on August 17, 1995, at the NRS facility were believed to be the source of the dust film on the Grand Calumet River observed on September 6, 1995 (DCN 052978).

Finally, the inspection report states that NRS had to submit a NOI letter requesting group permitting, apply for an individual storm water permit under 327 IAC 15-6, or eliminate the runoff channels. In addition, material handling had to be conducted in accordance with IC 13-7-4 (DCN 052978).

2.37.3 Other Possible PRPs

Inland Steel was identified as another possible PRP for the AOA during Tetra Tech's review of the NRS facility files. The NRS facility processes BOF "sloppy slag" generated by Inland Steel (DCN 052978). Inland Steel has been identified by IDEM as a PRP, and IDEM has sent a PRP notice letter to Inland Steel.

2.38 NEO INDUSTRIES, INC.

Between 1943 and 1945, the U.S. War Department manufactured armor plating for tanks and other equipment at what is now known as the NEO Industries, Inc. (NEO Industries), facility. The facility was shut down after World War II. In the 1960s, the facility was leased to U.S. Steel for steel coil storage. Between 1973 and 1982, Gates City Steel Corporation, a steel fabricator, operated at the facility. In 1982, NEO Industries, a Canadian company that performed chromium plating operations, leased the facility, which is located in the Great Lakes Industrial Center. NEO Industries was one of eleven tenants that leased space in the industrial center from Center Point Properties, Inc. According to a 1995 proposed final action report, Center Point Properties, Inc., is the current owner of the facility property (DCN 053035).

A discrepancy was found in the file documents regarding the entity that purchased NEO Industries' assets. One document indicates that this entity was NEO Industries Indiana, Inc. (DCN 053064). However,

another document indicates that the operational assets of NEO Industries were sold in September 1992 to Ensis, Inc. and Ensis, Inc., operated at the facility until March 1993, when it transferred its operations to a new location in Portage, Indiana. As a result of this relocation, NEO Industries changed its name to 6315 Indiana, Inc., in 1993 (DCN 053035). The tenant currently occupying the facility is Allied Mineral Products, Inc. (DCN 053025). Although it has been operated by a number of parties, the facility is referred to as the NEO Industries facility in this file report. Also, although NEO Industries changed its name to 6315 Indiana, Inc., in 1993, many file documents prepared after that date refer to the firm as NEO Industries. This report continues that practice.

2.38.1 Facility Location

The NEO Industries facility is located at 201 Mississippi Street in Gary, Indiana (DCN 053035). The facility is located in Priority Reach A, the Headwaters to the Pennsylvania Railroad Bridge, and in Priority Reach B, the Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996). The Grand Calumet River is about 900 feet north of the facility. In March 1993, the facility's chromium coating and plating operations were transferred to Portage, Indiana (DCN 053035).

2.38.2 Summary of Pertinent Information

The pertinent information presented below on the NEO Industries facility was drawn from documents in the Solid and Hazardous Waste Management and Water Management file rooms.

Environmental Response File Room

No documents for the NEO Industries facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

NEO Industries became a tenant of the Great Lakes Industrial Center in 1982 (DCN 053035). The facility coated and refurbished chromium coatings on rollers used by the local steel industry. In an electrochemical process, the rollers were dipped into a chromate solution bath. A direct electrical current was applied to the rollers and bath such that metallic chromium was drawn from the bath and deposited on the rollers (DCN 052985). Wastes generated at the facility include spent chromic acid, chromic acid sludge, and waste oil and mineral spirits from a maintenance shop (DCN 052987). NEO Industries submitted notification to EPA as a generator on September 12, 1986 (EPA ID No. IND 018 217 307) (DCN 053024) and subsequently submitted biennial reports for 1987 and 1989 identifying its generated waste as chromic acid solution (D007) (DCN 053005).

A NEO Industries employee complaint was filed with IDEM on November 11, 1988. The complaint alleged waste chromic acid dumping by the facility (DCN 0535005). Also, on April 2, 1990, a NEO Industries employee complaint letter was sent to IDEM and other state and federal agencies. The letter complained of environmental and health problems at the facility. Following is a summary of the alleged problems at the facility (DCN 053008):

- Filtering devices had not worked in 5 years; as a result, dead weeds and dead pigeons had been observed around the vents.

- Chromic acid, hydrochloric acid, mineral spirits, and waste oil had been pumped down city sewers.
- Chromic acid had been drained from the rollers into a sandy area beneath two sections of railroad ties.
- Tanks used to store waste chromic acid had overflowed, and excess chromic acid waste had been stored in open pits in the floor.
- A chromic acid spill had occurred when a 10,000-gallon tank drain broke (DCN 053018).

On April 25 and 26, 1990, a compliance evaluation inspection was conducted by IDEM in response to the April 2, 1990, employee complaint letter. Following is a summary of the observations made during the inspection (DCNs 053001 and 052994):

- No excess chromic acid was observed in open pits in the floor.
- No drippage was observed from the plated rollers set over the railroad ties.
- A yellowish stain in the soil was observed during sampling of the sand and soil beneath the railroad ties.
- Spillage of waste chromic acid resulted from rainwater runoff that overflowed two catch basins beneath the air scrubber units.
- Waste chromic acid was released because of the drippage from the chrome plating of the rollers.
- A dry well used for wastewater discharge was observed inside the building.
- Sewer contamination was observed.
- No signs of dumping were found at the locations identified in the November 11, 1988, employee complaint letter.

On April 15, 1993, ATEC Associates, Inc., notified IDEM that NEO Industries Indiana, Inc., had moved to Portage, Indiana. At the new location, the coating process was modified to minimize or "entirely eliminate" waste generation through use of evaporators (DCN 052985). Tetra Tech noted discrepancies in facility file documents as to whether NEO Industries Indiana, Inc., or Ensis, Inc., relocated the coating operations.

Water Management File Room

NEO Industries was subject to agreed orders issued by IDEM in 1991 and 1993 for illegal facility discharges. In response, NEO Industries implemented investigations and removal actions to address releases of chromium at the facility (DCN 053035).

Extensive investigations at the NEO Industries facility have revealed that chromium and hexavalent chromium in groundwater are the contaminants of concern (DCN 053057). In October 1994, a groundwater evaluation study plan (GESP) for the facility was completed by Conestoga-Rovers & Associates. The GESP states that in 1991, seven monitoring wells were installed at the facility during initial investigation activities. Sampling results from 1991 and 1992 indicated that hexavalent chromium concentrations exceeded the Indiana Water Quality Standard (IWQS) of 0.05 mg/L in three monitoring wells downgradient of the slag scale pit and the former chrome plating tanks (DCN 053064). Analytical data from the 1991 sampling activities indicated elevated concentrations of chromium and hexavalent chromium in storm sewer water and sediment (DCN 053035). The upper portion of the groundwater aquifer underlying the facility discharges to the Grand Calumet River, and the lower portion of the aquifer discharges to Lake Michigan (DCN 053027).

In December 1995, a proposed final action report containing a risk assessment (RA) was completed for the facility by Weaver Boos Consultants, Inc. According to the final action report, five sources of chromium were identified and removed from the facility. The following activities were conducted (DCN 053035):

- Open slag scale pit and storm sewer remediation
- New storm sewer installation
- Facility shutdown and cleanup
- Plating pit demolition
- Facility floor grinding and capping

A sixth potential source of chromium, a capped and buried slag scale pit containing chromium sludge, was identified in September 1995 but has not shown any evidence of discharging chromium into the environment. The final action report identifies a spill of 5,000 to 10,000 gallons of chromic acid into the chromic acid pit in November 1992 as a principal source of the chromium-contaminated groundwater (DCN 053035).

The groundwater fate and transport modeling results for the RA indicated that the chromium concentrations discharging into the Grand Calumet River were below the EPA ambient water quality standard and the IDEM IWQS of 11 $\mu\text{g/L}$. The final action report proposes to remove the capped and buried slag scale pit, the one known potential source of chromium remaining at the facility (DCN 053035).

According to a letter dated July 9, 1996, from IDEM to NEO Industries, the proposed final action and the RA were deficient. The letter states that the action was deficient in controlling the chromium plume and in monitoring the plume and its effects on the Grand Calumet River (DCN 053032). In a letter dated November 8, 1996, from IDEM to NEO Industries' attorney, IDEM requests that NEO Industries provide evidence of acceptable discharges into the Grand Calumet River and Lake Michigan or migration of the chromium plume through remediation (DCN 053027).

A letter dated November 17, 1997, from 6315 Indiana, Inc.'s attorney to IDEM stated that two reports, "Phase I Completion Report Slag Scale Pit Characterization" and "Phase I Completion Report Contingent Groundwater Remediation Work," were submitted to IDEM. The letter also states that 6315 Indiana, Inc., would continue to monitor the groundwater at the facility on a quarterly basis and would submit quarterly groundwater monitoring reports to IDEM (DCN 053025).

NEO Industries was a significant industrial discharger to the GSD treatment plant (IDEM 1996).

2.38.3 Other Potentially Responsible Parties

Other possible PRPs for the AOA identified in the NEO Industries facility files are summarized in Table 2-17. 6315 Indiana, Inc., Allied Mineral Products, Inc., Center Point Properties, Inc., Ensis, Inc.; Gates City Steel Corporation; Mercier; NEO Industries Indiana, Inc.; and the U.S. War Department are newly identified possible PRPs. A summary of the information in the document copies pertinent to GSD is provided in Section 2.23. U.S. Steel was also identified as another possible PRP, but IDEM has already issued a PRP notice letter to U.S. Steel (IDEM 1996).

TABLE 2-17

OTHER POSSIBLE PRPs ASSOCIATED WITH NEO INDUSTRIES FACILITY

Possible PRP	Pertinent Information
6315 Indiana, Inc.	In 1993, NEO changed its name to 6315 Indiana, Inc. (DCN 053035)
Allied Mineral Products, Inc.	Current facility operator (DCN 053025)
Center Point Properties, Inc.	Facility owner (DCN 053035)
Ensis, Inc.	One of two parties identified as purchasing NEO Industries' assets; facility operator from 1992 to 1993 (DCN 053035)
GSD	Operator of treatment plant that received facility wastewater (IDEM 1996)
Gates City Steel Corporation	Former facility operator and waste generator (DCN 053035)
Mercier	Stored "toxic chemicals" at 201 Mississippi Street in Gary, Indiana (DCN 053018)
NEO Industries Indiana, Inc.	One of two parties identified as purchasing NEO Industries' assets (DCN 053064 and 052985)
U.S. War Department	Former facility operator and waste generator (DCN 053035)

2.39 NORTHERN INDIANA DOCK

The operations conducted at the Northern Indiana Dock facility are not identified in the documents photocopied for the PRP search.

2.39.1 Facility Location

The Northern Indiana Dock facility is located at 3601 Canal Street in East Chicago, Indiana (DCN 053074). This facility is located in Priority Reach H, Columbus Drive to the Railroad Overpass and the Lake George Branch of the Indiana Harbor Ship Canal (IDEM 1996).

2.39.2 Summary of Pertinent Information

The pertinent information presented below on the Northern Indiana Dock facility was drawn from documents in the Water Management file room.

Environmental Response File Room

No documents for the Northern Indiana Dock facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

No pertinent documents for the Northern Indiana Dock facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

On August 17, 1995, an NPDES compliance inspection of the Northern Indiana Dock facility was conducted by IDEM. The inspection was conducted to observe potential storm water discharge points to the adjacent Indiana Harbor Ship Canal. The following observations were made during the inspection (DCN 053074):

- An unidentified discharge pipe on the far southwest portion of the metal sheet piling
- A hole in the dock wall near the unidentified pipe noted as a potential source of storm water runoff
- Several seeps along the dock wall entering the canal

On August 29, 1995, IDEM telephoned Debra Levin, the responsible official of the Northern Indiana Dock facility. According to the NPDES compliance inspection report, Ms. Levin stated that facility storm water discharges to the East Chicago sewer system. Also, she indicated that the storm water permit number for the facility is INR00029. IDEM requested that Ms. Levin keep a copy of the storm water permit and a facility map available at the facility. Also, IDEM requested that Northern Indiana Dock identify the source of the discharge pipe protruding from the dock wall at the south end of the facility property near the Phillips Pipe Line Co. property boundary (DCN 053074).

2.39.3 Other Possible PRPs

No other possible PRPs for the AOA were identified in the Northern Indiana Dock facility files.

2.40 NORTHERN INDIANA PUBLIC SERVICE COMPANY DEAN H. MITCHELL GENERATING STATION

The Northern Indiana Public Service Company (NIPSCO) Dean H. Mitchell Generating Station (Mitchell Station) facility is a fossil fuel-fired generating station that ~~has provided electricity for the northwest corner of Indiana since 1956~~ (DCN 053159). The facility is a subsidiary of NIPSCO Industries, Inc.

(DCN 053112), and is also referred to as NIPSCO #74 (DCN 053140). According to an E&E PA dated October 23, 1991, this facility was allegedly used as a slag dump prior to 1956. No information is available concerning where the slag was generated or who dumped it on site (DCN 053141). The facility has an NPDES permit for cooling water discharge to Lake Michigan (DCN 053124). The NIPSCO Mitchell Station facility has EPA ID No. IND 980 500 482 (DCN 053140).

During the file search, Tetra Tech facility photocopied documents pertaining to the facility and to three NIPSCO substations. All three file rooms contained documents pertinent to the NIPSCO Mitchell Station facility. The documents pertinent to the three NIPSCO substations were found in the Environmental Response and Water Management file rooms.

2.40.1 Facility Location

The NIPSCO Mitchell Station facility is located where Clark Road meets Lake Michigan about 4 miles northeast of Gary, Indiana (DCN 053147). This facility is an industrial discharger to GSD located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996). NIPSCO corporate headquarters is located at 5265 Hohman Avenue in Hammond, Indiana (DCN 053078). The three NIPSCO substations are located at (1) the intersection of 91st Avenue and Burr Street in Crown Point, Indiana; (2) 4820 Ash Avenue in Hammond, Indiana; and (3) on U.S. Steel property north of Buchanan Street at the U.S. Steel Gary Works facility in Gary, Indiana.

2.40.2 Summary of Pertinent Information

The pertinent information presented below on the NIPSCO Mitchell Station facility was drawn from documents in the Environmental Response, Solid and Hazardous Waste Management, and Water Management file rooms. The pertinent information on the three NIPSCO substations was drawn from documents in the Environmental Response and Water Management file rooms only.

Environmental Response File Room

On April 16, 1979, an oil spill at the NIPSCO Mitchell Station facility was reported to the U.S. Coast Guard and the Indiana Stream Pollution Control Board. According to an employee statement written on the day of the spill, miscellaneous sump pumps used on site were turned off because of a split in a pump line. As a result, the pit that the sump pumps release to overflowed into the discharge channel. Oil was observed in the discharge channel by a machine shop worker, and subsequently the sump pumps were turned back on. An "oil slick" was then observed on Lake Michigan east of the NIPSCO facility discharge point. According to a statement written on April 19, 1979, by Gary D. Logan of the Environmental Affairs Department, the oil sheen extended about 150 feet into Lake Michigan and about 0.25 mile east of the facility. By the end of the day on April 16, a new collar was installed across the discharge point (DCN 053170).

On June 9, 1982, oil was released from a ruptured pipe at the NIPSCO Mitchell Station facility. Oil from the pipe accumulated on the ground and drained into a yard drain or "outlet channel" that discharges to Lake Michigan. According to a letter dated June 11, 1982, from NIPSCO to the Indiana Stream Pollution Control Board, NIPSCO personnel contained most of the oil by placing absorbent booms and pillows in strategic locations across the yard drain. In addition, the remaining oil was pumped out or absorbed from the yard drain (DCN 053168).

On August 19, 1986, E&E conducted a site inspection at the NIPSCO Mitchell Station facility. According to the site inspection report, the facility stored low-sulfur Wyoming coal in two large unlined, piles on site. Also, plant wastes and process wastes such as fly ash and bottom ash were disposed of in four on-site ponds (DCN 053140). Other, unspecified wastes were also placed in the ponds (DCN 053159). The coal storage piles were located within 1,000 feet of the lakeshore (DCN 053124). The ash ponds were diked but lacked liners or leachate control systems. During the inspection, four soil samples, two fly ash samples, and one groundwater sample were collected. The fly ash and soil samples were found to contain elevated levels of aluminum, beryllium, cadmium, chromium, vanadium, and zinc. The groundwater sample did not contain organics but had elevated levels of arsenic, copper, magnesium, manganese, mercury, and zinc (DCN 053159). Metals were also detected in an on-site groundwater sample collected by EPA in January 1986 (DCN 053140). Both the fly ash and water runoff from the coal piles contained PAHs (DCN 053124).

According to the site inspection report, the main environmental concern at the facility was the potential for contaminants to migrate to Lake Michigan via surface water runoff or groundwater discharge. In addition, there was a concern that the facility might be contributing to bioaccumulation of toxic chemicals in the aquatic life of Lake Michigan. The East Chicago surface water intake is located 1.8 miles north of the facility in Lake Michigan. Most wells in the facility area are industrial wells that extend into bedrock. There may be dug or drilled wells screened in shallow, unconsolidated sands in the area (DCN 053159).

On August 5, 1987, about 1 ton of fly ash was spilled into the main circulating water outfall at the NIPSCO Mitchell Station facility. The spill occurred when a truck being loaded with fly ash overflowed. According to a letter dated August 6, 1987, from NIPSCO to IDEM, grab samples of the intake and discharge water were collected and analyzed for TSS. The analytical results indicated that the water contained a "normal" range of TSS (DCN 053155).

On January 21, 1991, 350 to 400 gallons of waste oil leaked from a transfer line used to move waste oil from the generating plant to a waste oil storage tank. According to a letter dated January 31, 1991, from NIPSCO to IDEM, NIPSCO believed that under 2 gallons of waste oil was sprayed into the air, over a breakwall, and into the facility's intake water. The remaining oil accumulated on the ground, covering an area of 500 to 600 square feet. Less than 20 gallons of the spilled waste oil drained into a storm drain that discharges into a miscellaneous sump. The remaining spilled waste oil was cleaned up by contractors. Safety-Kleen cleaned up the standing pools of oil on the ground, and HMS Services removed the oil from the miscellaneous sump. According to the NIPSCO letter, a third contractor was to be used to remove residual waste oil from the ground with oil-dry compound. About 320 to 355 gallons of waste oil was cleaned up. No oil sheen was observed near the facility's outfall to Lake Michigan. However, an oil sheen of less than 1 square yard was observed in the corner of an oil boom located in the facility discharge channel (DCN 053147 and DCN 053143).

On May 14, 1991, E&E conducted an off-site reconnaissance inspection near the facility. During the inspection, a pond and an AST were observed at the facility. A PA executive summary dated October 23, 1991, indicates that the geology of the facility area consists of unconsolidated lake sediments and till of Wisconsin age overlying limestones and dolomite bedrock. A potential exists for contaminants to migrate off site and enter Lake Michigan via base flow or surface water runoff because of poor containment of waste material (DCN 053141).

In April 1992, a draft site inspection prioritization for the NIPSCO Mitchell Station facility was completed by WESTON. Based on review of a PA and a letter from NIPSCO to IDEM dated August 6, 1987, WESTON concluded that surface water

and groundwater at the facility potentially discharge to Lake Michigan and provide a migration pathway for facility contaminants. WESTON assigned the NIPSCO Mitchell Station facility a Hazard Ranking System (HRS) score of 9.8 and recommended that the facility be considered a no further remedial action planned (NFRAP) site (DCN 053124).

On August 9, 1995, 50 to 100 gallons of light oil leaked from a turbine oil cooler system at the NIPSCO Mitchell Station facility. According to an initial incident report log, a light sheen was observed in the facility's outfall channel, and IDEM emergency response staff observed a small amount of sheen in 0.5-inch-diameter droplets. As a result, booms were placed in the channel to provide containment (DCN 053122).

On January 14, 1998, turbine oil leaked into a miscellaneous sump because of an equipment failure at the NIPSCO Mitchell Station facility. An initial incident report dated January 14, 1998, states that the spill involved 300 gallons of turbine oil (DCN 053083). A final incident report dated February 28, 1998, states the spill involved 2,740 gallons of turbine oil. According to the final incident report, some of the turbine oil leaked from the miscellaneous sump into the outfall channel, which held a containment boom and an absorbent boom. A vacuum truck was used to clean up the spill (DCN 053078). The final incident report indicates that about 2,710 gallons of turbine oil was recovered from the sump; 5 gallons was recovered from the outlet channel; and 25 gallons was released into Lake Michigan (DCN 053085).

Spills that have occurred at NIPSCO substations or related locations are summarized below.

On November 11, 1987, about 12 gallons of askarel fluid (40 to 60 percent PCB oil) was spilled at the Gaynor National Bank at 504 Broadway in Gary, Indiana. According to a final incident report, a contractor was removing transformer oil from a NIPSCO transformer at the Gaynor National Bank and placing it in a 55-gallon drum. The drum ruptured while it was being moved. The transformer oil was absorbed immediately after the spill and disposed of in an incinerator (DCN 053151).

On March 3, 1996, about 76 gallons of mineral oil dielectric fluid, a refined petroleum product owned by NIPSCO, was spilled at the NIPSCO substation located on U.S. Steel property north of Buchanan Street at the U.S. Steel Gary Works facility in Gary, Indiana. The spill was due to an electrical fault and covered an area of about 8,000 square feet. According to a letter dated March 14, 1996, from NIPSCO to IDEM, none of the spilled material was recovered and containment activities were not necessary because the oil was dispersed as a fine mist. The equipment in the spill area was cleaned, and as of March 14, 1996, the cleanup had been completed except for the side of a building (DCN 053109).

On November 3, 1996, about 1,600 gallons of non-PCB transformer oil was spilled at the NIPSCO substation located at 91st Avenue and Burr Street in Crown Point, Indiana. The spill area was diked with oil-dry bags and blankets. A vacuum truck was then used to remove the spilled oil (DCN 053107). Samples of sheen and oil were collected (DCN 053090). A supplemental report indicates that a field investigation was conducted at the substation on December 4, 1996. The report concludes that the spill cleanup was not effective. As a result, NIPSCO removed affected soil and gravel during the week of December 9, 1996 (DCN 053089).

Solid and Hazardous Waste Management File Room

According to a letter dated March 19, 1982, from NIPSCO to EPA, the NIPSCO Mitchell Station facility operates a surface impoundment that holds waste materials whose metal content is sometimes above the

limits specified in 40 *Code of Federal Regulations* (CFR) 261 prior to treatment. The surface impoundment is a hazardous waste storage facility. In 1981, six groundwater monitoring wells were installed around the impoundment. Analytical results for groundwater samples collected on February 8, 1982, revealed cadmium, chromium, and coliform bacteria at levels above drinking water standards (DCN 053193). Analytical results for groundwater samples collected on April 29, 1982, revealed no constituent levels above drinking water standards. Analytical results for groundwater samples collected on July 29, 1982, revealed cadmium, nitrate, and coliform bacteria at levels above drinking water standards (DCN 053189).

On August 7 and 8, 1991, B&V Waste Science and Technology Corp. (BVWST) conducted a PA/VSI at the NIPSCO Mitchell Station facility. The PA/VSI report identifies the following seven SWMUs and one AOC at the facility (DCN 053174):

SWMUs

- Waste oil tank
- Wastewater treatment plant
- Fly ash silo
- Surface impoundments (ash pits)
- Hazardous waste storage pad
- Frac tank handling area
- Satellite accumulation area

AOC

- UST location

The PA/VSI report indicates that the potential for a release of hazardous constituents to the groundwater was moderate for the surface impoundments, hazardous waste storage pad, frac tank handling area, and UST location. The potential for a release to surface water was high for the fly ash silo because of the proximity of process water discharge to the silo. A moderate potential existed for a release to surface water from the surface impoundments, hazardous waste storage pad, and frac tank handling area. Furthermore, the PA/VSI report indicates that soil contamination is likely to have occurred around the fly ash silo because of the fly ash spill in 1987. There is a moderate possibility that soils around the hazardous waste storage pad and the frac tanks handling area have been contaminated by spills or leaks. Also, there is a moderate possibility that the UST was leaking to subsurface soils (DCN 053174).

According to the PA/VSI report, the NIPSCO Mitchell Station facility generated one hazardous waste—1,1,1-trichloroethane (F001)—and three wastes that are specifically exempt hazardous wastes—bottom ash, fly ash, and boiler water pipe cleaning solution. In addition, the facility generated waste lubrication oil and operated a WWTP. The facility operated as an interim status RCRA TSD facility. On April 18, 1980, the facility submitted a RCRA Part A permit application; however, according to the PA/VSI report, NIPSCO had requested formal withdrawal of its Part A permit application because it no longer treated or disposed of hazardous waste on site. The facility had an NPDES permit (Permit No. IN 0000 124) to discharge main cooling water, ash pond discharge, sewage treatment water, boiler blowdown, and coal pile runoff to Lake Michigan. No NPDES permit violations were reported from June 1990 to June 1991 (DCN 053174).

The PA/VSI report indicates that a RCRA inspection was conducted at the NIPSCO Mitchell Station facility on April 16 and 29, 1981. During the inspection, rusted drums in poor condition were found on site. Another RCRA inspection conducted on February 19, 1991, revealed improper storage of waste hydrazine (U131) at the facility (DCN 053174).

Water Management File Room

According to Public Notice No. 93-9-F-F-P dated September 30, 1993, the NIPSCO Mitchell Station facility contains a coal-fired power plant whose operations result in an average discharge of 7 million gallons per day of treated industrial wastewater to Lake Michigan. NPDES Permit No: IN 0000 124 includes the following parameters to be limited, monitored, or both in the facility discharge from Outfalls No. 001, 101, 201, and 301: flow, "TRC," "clam trol," TSS, oil and grease, copper, iron, zinc, cadmium, total chromium, lead, mercury, nickel, BOD, *E. coli*, and pH (DCN 053200). The NIPSCO Mitchell Station facility is an industrial discharger of wastewater to GSD treatment plant, but the facility is not classified as a significant industrial user (IDEM 1996).

On August 13, 1995, about 1 gallon of transformer oil was released at the NIPSCO substation located at 4820 Ash Avenue in Hammond, Indiana near a neighbor's garage. According to a February 20, 1996, IDEM letter to NIPSCO, the neighbor reported the incident on September 1, 1995. The neighbor stated that NIPSCO collected soil samples at the facility but that the cleanup was not completed. IDEM requested that NIPSCO provide documentation of the cleanup measures, sample analytical results, and corrective measures associated with the release (DCN 053198). A response letter from NIPSCO dated March 14, 1996, states that the material released on August 13, 1995, was 1 gallon of mineral oil from a 50 KVA transformer. The letter states that less than 1 quart of oil reached the ground and that there was no possibility that the oil could threaten the waters of the state. The oil was cleaned up, and at a later date, NIPSCO hired Hammond Painting and Power Washing, Inc., to clean the neighbor's garage and wall again. Analytical results for the transformer mineral oil, dated August 16, 1995, indicate that the oil did not contain PCBs. An IDEM letter dated March 29, 1996, states that NIPSCO provided a satisfactory response and enforcement action against NIPSCO was ceased (DCN 053195).

2.40.3 Other Possible PRPs

GSD and NIPSCO Industries, Inc. were identified as other possible PRPs for the AOA during Tetra Tech's review of the NIPSCO Mitchell Station facility files. The facility is a subsidiary of NIPSCO Industries, Inc. (DCN 053112). NIPSCO Industries, Inc. is a newly identified possible PRP. The NIPSCO Mitchell Station facility is an industrial discharger of wastewater to the GSD treatment plant (IDEM 1996). A summary of the information in the document copies pertinent to GSD is provided in Section 2.23.

2.41 NORTHWEST FAMILY HOSPITAL

Northwest Family Hospital is a health care facility. According to the 1994 GSD annual report, Northwest Family Hospital was formerly called the St. Mary Medical Center (DCN 053208).

2.41.1 Facility Location

Northwest Family Hospital is located at 501 Family Plaza in Gary, Indiana (DCN 053208). This facility is located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996).

2.41.2 Summary of Pertinent Information

The pertinent information presented below on the Northwest Family Hospital facility was drawn from documents in the Water Management file room.

Environmental Response File Room

No documents for the Northwest Family Hospital facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

No documents for the Northwest Family Hospital facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

The Northwest Family Hospital facility is a significant industrial user that discharges wastewater to the GSD treatment plant. GSD issued letters of violation to the facility in 1992 for high COD, BOD, and phosphorus levels in facility wastewater. In the 1994 GSD annual report, the facility is listed in the category of significant noncompliance user for failure to provide self-monitoring data within 30 days of the due date (DCN 053208).

2.41.3 Other Possible PRPs

GSD and the St. Mary Medical Center were identified as other possible PRPs for the AOA during Tetra Tech's review of Northwest Family Hospital facility files. The facility is a significant industrial user of the GSD treatment plant (DCN 053208). A summary of the information in the document copies pertinent to GSD is provided in Section 2.23. Northwest Family Hospital was formerly called the St. Mary Medical Center (DCN 053208). A summary of the information in the document copies pertinent to the St. Mary Medical Center is provided in section 2.54.

2.42 NORTHWEST INDIANA WATER COMPANY

The Northwest Indiana Water Company facility performs water treatment and filtration processes necessary to deliver potable water to customers. According to the 1994 GSD annual report, GSD was notified on November 28, 1994, that the Northwest Indiana Water Company was formerly known as Gary Hobart Water Corporation (DCN 053215).

2.42.1 Facility Location

The Northwest Indiana Water Company facility is located at 650 Madison Street in Gary, Indiana (DCN 053215). This facility is located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996).

2.42.2 Summary of Pertinent Information

The pertinent information presented below on the Northwest Indiana Water Company facility was drawn from documents in the Water Management file room.

Environmental Response File Room

No documents for the Northwest Indiana Water Company facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

No documents for the Northwest Indiana Water Company facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

The Northwest Indiana Water Company facility is a significant industrial user that discharges wastewater to the GSD treatment plant. GSD cited the facility for significant noncompliance in 1993 because of slug load level exceedances in its wastewater discharge (IDEM 1996). In the 1994 GSD annual report, the facility is listed in the category of minor noncompliance user for TSS exceedances in its wastewater discharge. Minor noncompliance indicates that the facility was out of compliance at least one or two times during the 1994 reporting period (DCN 053215).

2.42.3 Other Possible PRPs

GSD and Gary Hobart Water Corporation were identified as other possible PRPs for the AOA during Tetra Tech's review of Northwest Indiana Water Company facility files. The facility is a significant industrial user of the GSD treatment plant (DCN 053215). A summary of the information in the document copies pertinent to GSD is provided in Section 2.23. Northwest Indiana Water Company was formerly known as Gary Hobart Water Corporation (DCN 053215). Gary Hobart Water Corporation is a newly identified possible PRP.

2.43 PHILLIPS PETROLEUM CORPORATION

During its review of the documents photocopied for the Phillips Petroleum Corporation facility, Tetra Tech found only information relating to Phillips Pipeline. According to IDEM, Phillips Pipeline has been sent a PRP notice letter. Therefore, Tetra Tech has not summarized the pertinent facility information found in the documents photocopied for the PRP search.

2.44 PRAXAIR, INC.

Praxair, Inc. (Praxair), has two facility locations in northern Indiana. The Praxair facility in East Chicago, Indiana, has been used as a packing and distribution center for industrial gases since 1970. Prior to 1970, the facility operated as a foundry (DCN 053306). The Praxair facility in Gary, Indiana, manufactures industrial gases (DCN 053341). Prior to June 5, 1992, both facilities were operated by Union Carbide Industrial Gases, Inc., which on June 5, 1992, changed its name to Praxair. On June 24, 1992, Union Carbide Industrial Services Company changed its name to UCISCO, Inc., which is a wholly owned

subsidiary of Praxair (DCN 053305). In addition, some facility documents dated earlier than 1992 refer to the Union Carbide Corporation Linde Division and Linde Gas Specialty as facility operators. Throughout this PRP search report, these various parties are referred to as Praxair.

2.44.1 Facility Location

One Praxair facility is located at either 4400 or 4550 Kennedy Avenue in East Chicago, Indiana. The facility lies about 1,000 feet east of the Indiana Harbor Ship Canal (DCNs 053251 and 053306). The second Praxair facility is located at the intersection of Clark and Dean Mitchell Roads in Gary, Indiana (DCN 053260). One Praxair facility is located in Priority Reach G, 151st to Columbus Drive, but Tetra Tech could not determine which of the two facilities is in Priority Reach G based on the information available. Also, Praxair is an industrial discharger to ECSD, which is located in Priority Reach E, the fork of the East-West Branch of the Ship Canal to the west end of Roxana Marsh (IDEM 1996). Tetra Tech has therefore summarized information pertinent to both facilities below. In addition, a facility document refers to a spill at 211 East Columbus Avenue, East Chicago, Indiana (DCN 053288), and another document refers to a facility "at the foot" of Second Avenue in East Chicago (DCN 053267). Pertinent information concerning these two locations is also summarized below.

2.44.2 Summary of Pertinent Information

The pertinent information presented below regarding Praxair was drawn from documents in the Environmental Response, Solid and Hazardous Waste Management, and Water Management file rooms.

Environmental Response File Room

Table 2-18 identifies spills known to have occurred at the Praxair facility in East Chicago and Gary, Indiana.

An initial incident report log dated February 15, 1989, indicates that a spill occurred at 211 East Columbus Avenue in East Chicago, Indiana. The log states that this property was leased from Praxair by McKewen Transportation Company. The spill was detected during excavation of three diesel USTs and one waste oil UST. Soil and groundwater sample analytical results indicated contamination (DCN 053288).

In a January 26, 1990, letter, Praxair notified IDEM of the discovery of oil and diphenyl ether (DPE) contamination on a Praxair property at the foot of Standard Avenue in East Chicago, Indiana. This houses compression, heat exchange, and cryogenic equipment is on the property. Praxair indicates in the letter that it planned to expand the hydrogen plant. In May 1990, Geraghty & Miller conducted soil and groundwater sampling on the property. Fifteen soil samples contained DPE concentrations above the detection limit. Only one groundwater sample contained a detectable DPE concentration, and two groundwater samples contained detectable concentrations of TPH. Nineteen soil samples had TPH concentrations above 100 mg/kg. According to a letter from Praxair to IDEM dated September 11, 1990, Praxair expected the hydrogen plant expansion work to begin on September 17, 1990 (DCNs 053256 and 053267).

In March 1994, Integrated Environmental Solutions, Inc., conducted a soil and groundwater assessment and diesel fuel area investigation at the facility in East Chicago, Indiana. This investigation was initiated as a result of a geotechnical exploration project completed in December 1993 that indicated the presence of hydrocarbon compounds in subsurface soils at the facility. The geotechnical exploration project was

TABLE 2-18
SPILLS AT THE PRAXAIR FACILITY IN EAST CHICAGO, INDIANA

Date of Spill	Material Spilled	Amount of Spill	Area Affected	Cleanup	DCN *
09/05/84	Ethylene oxide	50 gallons	Loading dock area	Water spray applied; evaporation	053304
12/10/86 (Date of leak test that detected UST leak)	Unleaded gasoline	Unknown; test indicated that 6,000-gallon UST was leaking at a rate of 0.17 gallon per day	Soil surrounding UST	Contents of UST removed, and tank was to be removed or abandoned; O&H Materials, Inc. contracted to assess damages and perform cleanup	053303, 053299
11/08/89	Ryolex Perlite	600 to 700 cubic feet	1 square mile on the facility property and three blocks to the north	Praxair employees, the East Chicago Street Department, and Ace Power Rodding used air compressors, brooms, street sweeping equipment, and vacuum trucks to perform cleanup	053270
12/18/89	26% sulfuric acid solution	360 gallons	<ul style="list-style-type: none"> • Tank containment area • About 200 square feet of ground • Solution seeped to asphalt and gravel and to sewer, which discharges to the ECSD sewage treatment system 	<ul style="list-style-type: none"> • Absorbent lime applied • Heritage contracted to clean up soil 	053276, 053281
12/29/93 (Discovery date)	No. 2 diesel or coal tar	Unknown	60 square feet of ground west of old powerhouse located 30 feet from building	Integrated Environmental Solutions, Inc., contracted to investigate extent of contamination and perform clean up	053253, 053251
01/12/88	Mobil 797 turbine oil	1,420 gallons	<ul style="list-style-type: none"> • 1,722 square feet of asphalt • 1,302 square feet of gravel • About 2 gallons in Lake Michigan • 30 gallons in mixing chamber 	<ul style="list-style-type: none"> • Leader Industries contracted to perform cleanup • 1,098 gallons recovered; remaining oil on ground recovered with absorbent materials • Booms used to move oil outside the summer discharge and water intake areas in Lake Michigan 	053296, 053291

TABLE 2-18 (Continued)

SPILLS AT THE PRAXAIR FACILITY IN EAST CHICAGO, INDIANA

Date of Spill	Material Spilled	Amount of Spill	Area Affected	Cleanup	DCN *
12/07/89	Diesel and waste oil	Unknown	Groundwater and soil surrounding USTs	USTs removed	053283
12/06/90 (Date of UST removal)	Diesel fuel	Unknown	<ul style="list-style-type: none"> • Groundwater that filled UST excavation had an oil sheen and a petroleum odor • Soil samples contained up to 927 ppm of TPH 	<ul style="list-style-type: none"> • USTs removed, but the tanks were in good condition, so Union Carbide states that oil spilled is from a filling station that used the USTs • Mars Environmental Solutions, Inc., was contacted to excavate contaminated soil 	053265, 053263, 053260

Note:

* DCN of facility document from which information was obtained

conducted in the center of the facility immediately west of a decommissioned powerhouse. During the assessment, 15 test pits were dug, and five monitoring wells were installed. Eight soil samples collected contained concentrations of TPH compounds ranging from 5 to 34,000 mg/kg. Each of the five monitoring wells sampled contained elevated concentrations of TPH constituents typical of diesel fuel and fuel oil. Groundwater concentrations of TPH ranged from 480 to 18,000 $\mu\text{g/L}$. According to the September 1994 property is bounded on the west by the Whiting-East Chicago boundary. According to the Praxair letter, soil sample analytical results revealed up to 46,500 ppm of TPH on the property. A hydrogen plant that soil and groundwater assessment and diesel fuel area investigation report, subsurface soils and groundwater throughout the investigation area contained elevated concentrations of TPH that indicated the presence of two separate fuel source areas. Also, the report states that the TPH-impacted area was localized and posed minimal risk of contaminant migration to the facility boundary (DCN 053235).

Solid and Hazardous Waste Management File Room

The pertinent information in the Solid and Hazardous Waste Management file room pertained solely to the Praxair facility in East Chicago, Indiana.

In 1985, Praxair performed a voluntary cleanup of buried low-pressure cylinders at the facility in East Chicago. Groundwater and soil samples collected when the cylinders were removed contained VOCs at concentrations of less than 1 ppm. Total heavy metal concentrations ranged from 0.005 to 9 ppm in groundwater and 0.04 to 1,620 ppm in soil (DCN 053306). A February 20, 1985, letter from Praxair to IDEM indicates that ATEC Associates, Inc., installed three monitoring wells in the area of the cylinder removal. The ATEC Associates, Inc., soil and groundwater study revealed no contamination. O.H. Materials Company was contracted to unearth the cylinders (DCN 053324). All buried cylinders were removed and disposed of off site in 1985 (DCN 053306).

On December 4, 1991, Tetra Tech (at that time PRC Environmental Management, Inc.) completed a PA/VSI report for the Praxair facility in East Chicago. The PA/VSI report identifies the following six SWMUs and one AOC at the facility (DCN 053306):

SWMUs

- Satellite accumulation areas
- Drummed waste storage area
- Dust collectors
- Returned cylinder staging area
- Scrubbers
- Former incinerator

AOC

- Former buried cylinders site

The PA/VSI report indicates that there was a low potential for a release of hazardous constituents to any medium from the SWMUs. According to the report, sampling conducted in 1985 at the AOC indicated groundwater and soil contamination, and there was a low potential for a release to air and surface water from this contamination. At the time of the PA/VSI, the facility did not have an NPDES permit, and all wastewaters were being discharged to the ECSD treatment plant under Permit No. 541. There were no records of permit violations (DCN 053306).

Water Management File Room

The Praxair facility in Gary, Indiana, was issued NPDES Permit No. IN 0000035, which became effective on June 1, 1990. According to Public Notice No. 94-4-B-F-P dated April 22, 1994, the facility's operations resulted in an average discharge of about 80 million gallons per day of wastewater to Lake Michigan (DCN 053341). In July 1994, Outfall 001 had a positive net oil and grease value (DCN 053340).

In a February 29, 1996, letter to IDEM, Praxair requests the withdrawal of an NPDES permit application submitted in July 1995, for its East Chicago facility because the facility would continue to discharge wastewater to the ECSD treatment plant/WWTP. The letter also states that the facility had not discharged wastewater associated with NPDES permit No. IN 0000043 since 1983 (DCN 053339).

According to a July 25, 1996, ECSD industrial compliance status report, the Praxair facility in East Chicago was issued an NOV for one fluoride and two copper violations in January and February 1996 (DCN 053335). A July 24, 1997, ECSD industrial compliance status report indicates that the facility was issued an NOV for oil and grease in June 1997 (DCN 053331). An October 23, 1997, ECSD industrial compliance status report indicates that the facility was issued an NOV for oil and grease levels in facility wastewater in July 1997 and for pH levels in facility wastewater in August 1997. In addition, the facility experienced "chronic" oil and grease violations in 1997 (DCN 053327). The facility was in total compliance according to ECSD industrial compliance status reports dated March 31, 1995 (DCN 054550); January 25, 1996 (DCN 054546); April 25, 1996 (DCN 054542); January 23, 1997 (DCN 054538); and April 25, 1997 (DCN 054533).

2.44.3 Other Possible PRPs

Other possible PRPs for the AOA identified in the Praxair facility files are summarized in Table 2-19. Linde Gas Specialty; McKewn Transportation Company; UCISCO, Inc.; Union Carbide Corporation Linde Division; Union Carbide Industrial Gases, Inc. are newly identified possible PRPs. A summary of the information in the document copies pertinent to ECSD is provided in Section 2.16.

TABLE 2-19

OTHER POSSIBLE PRPS ASSOCIATED WITH PRAXAIR FACILITY

Possible PRP	Pertinent Information
ECSD	Operator of treatment plant that receives facility wastewater (DCN 053306)
Linde Gas Specialty ^a	Named as facility operator (DCN 053281)
McKewn Transportation Company	Leased property Praxair at 211 East Columbus in East Chicago, Indiana, where contamination was detected (DCN 053288)
UCISCO, Inc. ^a	Wholly owned subsidiary of Praxair (DCN 053305)
Union Carbide Corporation Linde Division ^a	Named as facility operator (DCN 053291)
Union Carbide Industrial Gases, Inc. ^a	Former name of Praxair (DCN 053305)

^a Relationship to Praxair not clearly defined in facility documents

2.45 RALSTON STREET LAGOON, GARY SANTARY DISTRICT

The Ralston facility is a lagoon used by the GSD between 1962 and 1987 for disposal of sludge generated by the municipal treatment plant (DCNs 053347, 05455, and 054552). The approximately 12-acre lagoon was initially excavated to provide fill for construction of the Indiana Toll Road. The Ralston facility received daily discharges of sludge from the GSD WWTP (DCN 054555). Section 2.23 presents additional information concerning the GSD WWTP and the Ralston facility found in GSD facility files.

A consent decree was imposed on GSD in October 1992. The consent decree required GSD to implement a remedial program in order to secure clean closure for the Ralston facility under TSCA and to implement a Grand Calumet River remediation project in Priority Reach B (IDEM 1996).

2.45.1 Facility Location

The Ralston facility is located at 3600 West Third Avenue in Gary, Indiana. The EPA identification number for the facility is IND 077 001 808 (DCN 054555). The Ralston facility lies on the west side of Ralston Street between the Grand Calumet River and the Indiana-90 Toll Road. The facility is about 50 feet from the Grand Calumet River at its closest point (DCN 052695). This facility is located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996).

2.45.2 Summary of Pertinent Information

The pertinent information presented below on the Ralston facility was drawn from documents in the Solid and Hazardous Waste Management file room.

Environmental Response File Room

No documents for the Ralston facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

A March 15, 1983, inspection of the Ralston facility revealed three problems: (1) the lagoon was nearing its overflow point, (2) the overflow structure had not been properly sealed and was discharging into the Little Calumet River, and (3) the north and east lagoon levees were leaching (DCN 053347)

On May 4, 1983, 30 samples were collected from Ralston facility sludge. PCB concentrations in the sludge samples ranged from less than 6.32 to 1,158 mg/kg, with 16 of the samples having PCB concentrations exceeding 50 mg/kg. The average PCB concentration was between 214.9 and 223.75 mg/kg. In June and July 1983, six groundwater monitoring wells were installed upgradient and downgradient of the lagoon. Analytical results for groundwater samples collected in August and September 1983 revealed about 1 ppb of PCBs in one downgradient monitoring well. The results also revealed higher concentrations of ammonia, TOC, TDS, and total organic halogens in downgradient groundwater than were found in upgradient groundwater. The excessive levels of PCBs in the facility sludge samples and the detectable levels of PCBs in a groundwater sample represented violations of TSCA and State Regulation 320 in IAC 7 (DCN 053347).

An undated report on the facility lagoon states that GSD operational problems have often been documented, including problems with its sludge treatment operations. The report also states that GSD's digesters were nonfunctional and that raw sludge was being discharged to the lagoon daily (DCN 053347)

A December 12, 1983, inspection of the Ralston facility by EPA Region 5 revealed a discharge from the lagoon (DCN 053347).

Water Management File Room

No documents for the Ralston facility were found in the Water Management file room.

2.45.3 Other Possible PRPs

No other possible PRPs for the AOA were identified during Tetra Tech's review of the Ralston facility files.

2.46 REPUBLIC ENGINEERED STEELS, INC.

Two facility locations were identified for Republic Engineered Steels, Inc. (RESI). Operations at the RESI facility located at 2800 East Dunes Highway in Gary, Indiana, include finishing of steel bars (IDEM 1996). The operations conducted at the RESI facility located at 4000 East 7th Avenue in Gary, Indiana, are not identified in the documents photocopied for the PRP search.

2.46.1 Facility Location

One RESI facility is located at 2800 East Dunes Highway in Gary, Indiana, and in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996). However, the document copies made for the PRP search pertain only to the RESI facility located at 4000 East 7th Avenue in Gary, Indiana (DCN 053353). According to a letter from RESI to EPA Region 5, dated August 24, 1993, RESI purchased the former Western Steel Group, Inc., facility located at 4000 East 7th Avenue in Gary, Indiana, on July 27, 1993 (DCN 053375). Based on the information available, Tetra Tech cannot determine whether the facility at 4000 East 7th Avenue in Gary, Indiana, is in the AOA.

2.46.2 Summary of Pertinent Information

The pertinent information presented below on the RESI facility located at 4000 East 7th Avenue in Gary, Indiana, was drawn from documents in the Solid and Hazardous Waste Management file room. Pertinent information on the RESI facility located at 2800 East Dunes Highway in Gary, Indiana, was obtained from IDEM and is summarized in the Water Management file room subsection.

Environmental Response File Room

No pertinent documents for either RESI facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

On August 24, 1993, RESI notified EPA Region 5 that RESI had purchased the former Western Steel Group, Inc., facility located at 4000 East 7th Avenue in Gary, Indiana (EPA ID No. IND 984 870 048). The purchase was effective as of July 27, 1993 (DCN 053375). According to a 1993 hazardous waste biennial report, the facility that RESI purchased from Western Steel Group, Inc., was idle at the time of the purchase. According to a RESI letter to IDEM, before RESI began operations at the facility, RESI removed and properly disposed of all unwanted products and all wastes that made the facility a large-

quantity generator in 1993. The RESI letter also states that the facility would likely operate as a small-quantity generator after 1993 and would recycle spent parts washer solvent (DCN 053353).

Water Management File Room

The RESI facility located at 2800 East Dunes Highway in Gary, Indiana, is a significant industrial discharger of wastewater to the GSD treatment plant. GSD issued letters of violation to RESI in 1992 for high COD, BOD, and TSS levels in facility wastewater (IDEM 1996).

No documents for either RESI facility were found in the Water Management file room, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in this file room.

2.46.3 Other Possible PRPs

GSD was identified as another possible PRP for the RESI facility located at 2800 East Dunes Highway in Gary, Indiana (IDEM 1996). A summary of the information in the document copies pertinent to GSD is provided in Section 2.23. Another possible PRP identified during Tetra Tech's review of the RESI facility files is Western Steel Group, Inc., the former owner of the RESI facility located at 4000 East 7th Avenue in Gary, Indiana (DCN 053375). Western Steel Group, Inc., is a newly identified possible PRP.

2.47 ROBINSON STEEL

The Robinson Steel facility rolls out coils of steel and cuts the coils into sections. The facility then packages the steel sections and ships them to its customers (DCN 053376).

2.47.1 Facility Location

The Robinson Steel facility is located at 4303 Kennedy Avenue in East Chicago, Indiana (DCN 053376). This facility is located in Priority Reach G, 151st to Columbus Drive (IDEM 1996).

2.47.2 Summary of Pertinent Information

The pertinent information presented below on the Robinson Steel facility was drawn from documents in the Solid and Hazardous Waste Management file room.

Environmental Response File Room

No documents for the Robinson Steel facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

On November 18, 1992, a compliance evaluation inspection was conducted at the Robinson Steel facility. According to the compliance evaluation inspection report, the Robinson Steel facility was assigned EPA ID No. IND 984 899 500 in 1991. Robinson Steel voluntarily cleaned up soil contaminated with lead about 150 feet north of the facility building. About 231 cubic yards of soil was excavated and transported off site. After the soil was excavated, Robinson Steel submitted a biennial report to the state indicating that the facility would submit notification as a large-quantity generator in 1991. During the 1992 inspection, no hazardous waste generation was observed on site except for that associated with one 16-gallon Safety-Kleen parts washer. The compliance evaluation inspection report indicated that the

facility's status should be changed from large-quantity generator to conditionally exempt small-quantity generator (DCN 053376).

Water Management File Room

No documents for the Robinson Steel facility were found in the Water Management file room, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in this file room.

2.47.3 Other Possible PRPs

No other possible PRPs for the AOA were identified in the Robinson Steel facility files.

2.48 ROLL CENTER, INC.

Roll Center, Inc. (Roll Center), facility operations include reconditioning and electroplating of rolls of metal for the steel and aluminum industries (DCN 053381).

2.48.1 Facility Location

The Roll Center facility is located at 218 Mississippi Street in Gary, Indiana (DCN 053381). This facility is located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996).

2.48.2 Summary of Pertinent Information

The pertinent information presented below on the Roll Center facility was drawn from documents in the Water Management file room.

Environmental Response File Room

No documents for the Roll Center facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

No pertinent documents regarding the Roll Center facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

The Roll Center facility is classified as a significant industrial user that discharges wastewater to the GSD treatment plant. In 1992, GSD issued letters of violation to the facility for high chromium levels in its wastewater discharge (IDEM 1996). The 1994 GSD annual report states that the Roll Center facility recycles all process wastewater and therefore does not discharge process flows to the GSD collection system. GSD lists the facility in the category of "always compliant." The facility has NPDES Permit No. 0054798 for discharging cooling water (DCN 053381).

2.48.3 Other Possible PRPs

GSD was identified as another possible PRP for the AOA during Tetra Tech's review of the Roll Center facility files. The Roll Center facility is classified as a significant industrial user of the GSD treatment

plant, although the facility does not discharge process flows to the GSD collection system (DCN 053381). A summary of the information in the document copies pertinent to GSD is provided in Section 2.23.

2.49 RUBBER MATERIAL HANDLING, INC.

The Rubber Material Handling, Inc. (RMH), facility processed waste tires. The facility ceased operation prior to July 16, 1994 (DCN 053390).

2.49.1 Facility Location

The former RMH facility is located at 4407 Railroad Avenue in East Chicago, Indiana (DCN 053390). This facility is located in Priority Reach G, 151st Street to Columbus Drive (IDEM 1996). According to an undated agreed order, Enterprise Center I, L.P. (Enterprise Center), owns the property at 4407 Railroad Avenue (DCN 053390). In document copies that Tetra Tech reviewed, Enterprise Center is also referred to as the East Chicago Enterprise Center and the East Chicago Enterprise Center/ The Prime Group (DCN 053388). RMH's headquarters are located at 524 West Chicago Avenue in East Chicago, Indiana. RMH is an Indiana Corporation (DCN 053390).

2.49.2 Summary of Pertinent Information

The pertinent information presented below on the former RMH facility was drawn from documents in the Solid and Hazardous Waste Management file room.

Environmental Response File Room

No documents for the RMH facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

On July 16, 1994, a fire occurred in a covered warehouse used to store waste tires at the RMH facility. According to an undated agreed order concerning IDEM, the City of East Chicago, Indiana; Enterprise Center; and RMH, RMH operated a waste tire processing plant near the covered warehouse. The agreed order findings of fact indicate that RMH owned all the waste tires and tire debris (solid waste under IC 13-7-1-22) on site and in the warehouse. Clark Materials Handling, Inc. (Clark Materials), leased the facility property from Enterprise Center on May 1, 1990, pursuant to an industrial building lease. Then RMH allegedly subleased the facility from Clark Materials. Clark Materials is a debtor in a Chapter 11 bankruptcy case, and according to the findings of fact, Clark Materials has specifically disavowed any ownership interest in the waste tires and tire debris at the facility (DCN 053390).

On July 29, 1994, IDEM declared the fire to be an environmental emergency. On August 9, 1994, Enterprise Center submitted to IDEM and EPA an assessment of whether hazardous substances may have been released during the fire (the assessment was included in the document copies). The fire was extinguished around August 12, 1994, and the stored waste tires and tire debris were temporarily relocated to a facility located at 5400 Cline Avenue in East Chicago. IDEM continued to monitor the facility for releases of pyrolytic oils and hazardous substances. According to the agreed order findings of fact, IDEM reserves its right to recover the costs of responding to the fire from any legally responsible party. Also, IDEM alleges that the waste tires and tire debris were improperly disposed of at the RMH facility in violation of IC 13-7-4-1(3). Enterprise Center denies IDEM's allegations (DCN 053390).

An inspection was conducted at the RMH facility on February 19, 1996. According to the open dump inspection report, the inspectors found several areas containing tire debris and a rusted and smashed 55-gallon drum that was releasing an unknown material onto the ground. The inspection report states that the facility was in better condition than it was during a December 1995 inspection but was still not in compliance. Items on site that needed to be addressed include fire demolition debris, bricks, electrical wire, whole tires, steel belts from tires, car batteries, and 55-gallon drums (DCN 053388).

Water Management File Room

No documents for the RMH facility were found in the Water Management file room, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in this file room.

2.49.3 Other Possible PRPs

Clark Materials and Enterprise Center were identified as other possible PRPs for the AOA during Tetra Tech's review of the RMH facility files. RMH allegedly subleased the facility from Clark Materials. Clark Materials is a debtor in a Chapter 11 bankruptcy case, and according to the agreed order findings of fact, Clark Materials has specifically disavowed any ownership interest in the waste tires and tire debris at the facility (DCN 053390). IDEM has already issued a PRP notice letter to Clark Materials (IDEM 1996). Enterprise Center owns the facility property (DCN 053390). In document copies that Tetra Tech reviewed, Enterprise Center is also referred to as the East Chicago Enterprise Center and the East Chicago Enterprise Center/The Prime Group. Enterprise Center is an Illinois limited partnership with its headquarters at 77 W. Wacker Drive in Chicago, Illinois (DCN 053388). Enterprise Center is also a newly identified possible PRP.

2.50 SAFETY-KLEEN OIL RECOVERY COMPANY

The Safety-Kleen Oil Recovery Company (Safety-Kleen) facility operates as a used oil re-refinery. The facility includes an industrial WWTP (DCN 053430). The facility EPA ID No. is IND 077 042 034 (DCN 053467). The Old Dutch Refinery operated at the facility in the 1930s (DCN 053443). In 1972, American Recovery Corporation Inc. (ARCI) purchased the facility from Associated Box Company (DCNs 053467 and 053470). ARCI conducted used oil recycling operations at the facility until about 1987 (DCN 053467). The facility was subsequently owned by Breslube USA, Inc. (Breslube), which leased the southeast portion of the facility to Clark Oil Company for installation of an underground petroleum line. In 1988, Safety-Kleen purchased the facility and expanded the used oil recycling operations over the entire facility (DCNs 053437 and 053464). Several facility documents refer to Safety-Kleen Corporation rather than Safety-Kleen Oil Recovery Company. The relationship between these two entities is not made clear in the documents.

2.50.1 Facility Location

The Safety-Kleen facility is located at 601 Riley Road in East Chicago, Indiana (DCN 053399). This facility is located in Priority Reach H, Columbus Drive to Railroad Overpass and the Lake George Branch of the IHSC (IDEM 1996). Also, the Safety-Kleen facility is an industrial discharger to ECSD, which is located in Priority Reach E, the fork of the East-West Branch of the Ship Canal to the west end of Roxana Marsh (IDEM 1996). The facility is bordered on the south by the Lake George Branch of the Indiana Harbor Ship Canal.

2.50.2 Summary of Pertinent Information

The pertinent information presented below on the Safety-Kleen facility was drawn from documents in the Environmental Response, Solid and Hazardous Waste Management, and Water Management file rooms.

Environmental Response File Room

All the information pertinent to the Safety-Kleen facility in the Environmental Response file room addresses events that have occurred since the facility has been operated by Safety-Kleen.

On January 13, 1993, partially treated process wastewater was spilled at the Safety-Kleen facility. According to an IDEM initial incident report, the amount of material spilled was 300 gallons. However, a letter from Safety-Kleen to IDEM dated January 13, 1993, indicates that the amount of material spilled was 150 gallons. The spill occurred when a portable wagon used to transfer the wastewater to an equalization tank outside a bio tank farm overflowed. The wastewater was spilled on a snow-covered concrete surface located about 20 feet from a storm sewer inlet. After the spill, the storm sewer was diked with oil-dry that was subsequently shoveled into a barrel for disposal. The contaminated snow was removed and processed in the WWTP. The IDEM initial incident report states that 150 to 250 gallons of wastewater leaked into the storm sewer, which discharges to the Indiana Harbor Ship Canal (DCN 053405).

On July 28, 1995, about 700 gallons of Product RHT Base Lube Oil (RHT Base Oil) was spilled on about 200 by 40 feet of property leased by Safety-Kleen from Amoco Oil Company (Amoco) and on adjacent property owned by Amoco west of the Safety-Kleen rail transfer station. The spill occurred while a railcar at the rail transfer station was being filled. Immediately after the spill, Safety-Kleen contracted Smith Environmental Technologies Corporation (Smith) to clean up the spill. Using a vacuum truck, Smith removed 250 gallons of oil and 800 gallons of oily water. The recovered oil was managed at the Safety-Kleen facility. Between July 31 and August 1, 1995, Smith excavated 60 tons of impacted soil and stored it in roll-off bins (DCN 053399).

According to a letter from Safety-Kleen to IDEM dated February 7, 1996, soil sampling events had been conducted near the July 1995 spill area in September 1994 (baseline sampling prior to Safety-Kleen's leasing the property); on July 31, 1995; and on September 20, 1995. Soils with visible staining and detectable concentrations of TPH were documented during the September 1994 sampling event. The soil sampling conducted in July and September 1995 revealed concentrations of RHT Base Oil. Between October 3 and 5, 1995, the remaining contaminated soil was excavated. The contaminated soil was stored in roll-off bins and was transported to the Waste Management Deercroft facility in Michigan City, Indiana, for disposal. According to Safety-Kleen, the "July 1995 spill has been adequately remediated" (DCN 053399).

On June 1, 1996, about 2,800 gallons of clean lubricant oil was spilled near the railcar loading area at the Safety-Kleen facility. According to a November 26, 1997, final incident report, about 1,300 gallons of the spilled oil migrated onto Amoco property. A Safety-Kleen cleanup contractor used a vacuum truck to remove the oil. The report states that the cleanup was ongoing (DCN 053393).

Two known spills involved Safety-Kleen but did not occur at the facility. First, on September 4, 1991, an employee of Safety-Kleen spilled about 9 gallons of mineral spirits during a demonstration. The spill covered about 10 square feet at the intersection of 169th Street and Parish Road in Hammond, Indiana (DCN 053416). Second, on July 6, 1992, about 5 gallons of perchloroethylene and tetrachloroethylene was spilled from a truck in front of 2553 Cline Avenue in Gary, Indiana. About 2 gallons of the material

was contained in the truck by absorbent booms. The remaining 3 gallons of material that spilled on gravel was cleaned up using cob absorbent and absorbent sheets. All contaminated gravel was excavated using shovels and was then stored in drums that were sent to the Safety-Kleen facility (DCN 053411).

Solid and Hazardous Waste Management File Room

Facility documents indicate that ARCI operated the facility from 1972 to about 1987 (DCNs 053437 and 053467), when Breslube became the facility owner and operator. Safety-Kleen purchased the facility in 1988 (DCN 053437).

The facility lies on urban land characterized by areas that have been filled with soil, cinders, basic slag, and trash. The facility's surface water runoff drains to the south toward the Lake George Branch of the Indiana Harbor Ship Canal; however, most drainage from the facility is restricted by a surrounding, 5-foot-high, concrete containment wall. Groundwater at the facility is located above the Calumet aquifer. The water table is less than 8 feet bgs (DCN 053443).

Three fires have been reported at the facility. The first fire was caused by a defect in the design of the reactors in a former plant. This fire occurred in about 1977 (DCN 053455). During the fire, the reactors and two product storage tanks were damaged. This equipment was subsequently replaced (DCN 053443).

ARCI submitted a hazardous waste notification form for the facility to EPA on August 15, 1980. The form indicates that several RCRA-listed wastes (K048 to K052) were managed on site and that the facility was operating as a generator and TSD facility. In October 1980, ARCI notified EPA that the facility should be excluded from RCRA hazardous waste regulations. A December 4, 1980, EPA inspection at the facility revealed that hazardous wastes were still stored there. As a result, an agreed order was signed that granted the facility interim status and allowed the facility to accept hazardous waste (DCN 053443).

On May 7, 1982, the second fire occurred at the facility during structural work at the north end of a former underground dump tank. The fire damaged storage tank 51, and oily fire water was observed near the fire (DCN 053443). A foam unit maintained by Amoco was used to help extinguish the fire (DCN 053455). According to a May 7, 1982, letter concerning the fire, the fire was contained in a small area, and the foam and fire water were contained by dikes erected by employees of Industrial Disposal who had transported sand to the facility. A small amount of oil was observed floating on the surface of the fire water. A contractor, General Drainage, vacuumed up the fire water, which was then discharged into the on-site API separator, which itself discharged to the city sewers. No discharges resulting from the fire were observed in the Lake George Branch of the Indiana Harbor Ship Canal (DCN 053470).

In November 1983, the third fire occurred at the facility because of an equipment failure in Plant 1. About 2,000 gallons of used oil was released onto a containment pad associated with Plant 1. Also, an unknown amount of fire water, foam, and oil overflowed from the containment system. Much of the spilled oil and fire water were pumped into storage tanks 51 and 52; the remaining oil and fire water were solidified and stored for off-site disposal. The contaminated soil in the area was excavated down to 3 to 6 inches bgs (DCN 053443). After the fire, the damaged plant was renovated using new piping, valves, and pumps and automatic alarms and valves (DCN 053455).

Facility inspections conducted by IDEM on October 23, 1985, and January 17, 1986, revealed several violations, including shipment of oil recovery sludge off site as nonhazardous waste. As a result, a summary of findings of violation was issued, and subsequently an agreed order was negotiated between the facility and IDEM (DCN 053443).

An environmental audit conducted in 1986 revealed 1 foot of oil staining the banks of the Indiana Harbor Ship Canal. The staining was not directly attributed to the facility, but it was "alleged" that the facility released oil to the Indiana Harbor Ship Canal during one of its fires (DCN 053443).

On May 12, 1986, Environmental Risk Assessment Service (USA), Ltd. (ERAS), completed a report on the facility. The report states that all water discharges from the facility went directly to the ECSD treatment plant under a permit effective April 18, 1986. The facility was out of compliance in 1985 because of ammonia-nitrogen, oil and grease, phenol, soluble iron, total phosphorus, copper, and cyanide levels in facility wastewater. The report states that "the past releases have not injured the ECSD facility and, while as part of the ECSD releases, they may have contributed to the contamination of the Little Calumet River, they would not have made a sufficient contribution upon which to base claims of civil liability against ARCI." Also, the facility presented a slight potential for contaminating surface water. The loading area did not have secondary containment, "although the flatness of the land, the absence of streams in the area, and the presence of the diked enclosure south of the parking lot, between it and the IHSC, make the escape of high viscosity oils from the site unlikely" (DCN 053455).

The ERAS report states that the possibility of a release of oil to facility groundwater was somewhat high. Oil stains had been reported near the truck loading area at the facility. At the time of the ERAS report, ARCI stated that oil spills of 10 to 50 gallons occurred six to eight times a year where trucks load and unload and near the North Tank area as a result of overflows and broken hoses. Spilled oil was pumped, and the surrounding soil was cleaned up with a shovel. ARCI also reported that during heavy rain, oil contamination was observed in the local storm sewers (DCN 053455). At the time of the ERAS report, facility process sludges were sent to a Chemical Waste Management landfill, CID No. 2; previously solid waste from the facility had been sent to Wheeler Sanitary Landfill. According to the ERAS report, the facility was receiving much of its waste oil from U.S. Steel. Some of the waste oil was mixed with waste pickle liquor, a hazardous waste (DCN 053455).

On October 15, 1986, EPA's FIT conducted an inspection at the facility. During the inspection, three soil samples were collected near tank farm area 3, storage tank 50, and storage tank 52. The analytical results indicated the presence of several organic and inorganic compounds both in the samples collected on site and in a background sample collected 500 feet east of the facility (DCN 053443).

A December 9, 1987, IDEM letter concerning the facility was sent to Recovery Acquisition Corporation (RAC). The letter

- Acknowledges receipt of a RAC letter requesting transfer of interim status from ARCI to RAC
- Identifies issues that must be resolved prior to approval of the requested transfer
- Identifies Part A permit application deficiencies
- States that because RAC is a wholly owned subsidiary of Breslube Corporation (a subsidiary of Safety-Kleen), the facility owner would be Safety-Kleen (DCN 053467)

A December 22, 1987, Safety-Kleen letter responds to the December 9, 1987, IDEM letter (DCN 053464). The Safety-Kleen letter

- Addresses issues and deficiencies outlined in IDEM's letter

- Identifies the new facility owner and operator as Breslube and requests that interim status be transferred to the new owner and operator
- States that while its corporate structure is generally as discussed in IDEM's letter, Safety-Kleen is not the owner and operator of the facility
- States that Breslube (a legal corporation) is owned by Breslube Holding Corp., which is thus the legal owner and operator of the facility
- States that Breslube Holding Corp. is not a wholly owned subsidiary of Safety-Kleen and that Breslube Holding Corp.'s interests and assets are not directly transferable

ECSD issued an industrial wastewater discharge permit with limits for 19 parameters to the facility on March 10, 1988. According to a 1990 A.T. Kearney, Inc. (Kearney), RCRA facility assessment PA/VSI report, the facility had historically exceeded these limits. The facility was out of compliance between January 1, 1987, and October 7, 1989, because of phenol, oil and grease, soluble iron, pH, total phosphorus, ammonia-nitrogen, copper, mercury, and chromium levels in facility wastewater. At the time of the PA/VSI, the facility was operated by Breslube (DCN 053443).

On August 8, 1988, the facility submitted a Part B permit application. A revised Part B permit application was submitted in December 1988 (DCN 053443).

During the 1990 PA/VSI, Kearney noted that facility releases to Indiana Harbor Ship Canal had occurred in the vicinity of the barge loading and unloading area, possibly as a result of loading and unloading activities at the facility. In 1989, concrete had been laid throughout the facility. During the VSI, staining was observed on the concrete. The PA/VSI report states that "based on the VSI observations, it is likely that spillage also occurred prior to installation of the concrete." The PA/VSI report also notes that hydrocarbons, arsenic, lead, zinc, and anthracene had been detected on the former Concrete Company property west of the facility; the former Concrete Company property had been purchased by Breslube prior to February 1990. According to the PA/VSI report, this contamination might have resulted from overfilling of an underground fuel storage tank and the close proximity of a boiler room (DCN 053443).

On October 31, 1991, a RCRA facility investigation Phase II release assessment work plan was completed by TriHydro Corporation. The work plan states that all storage tanks at the facility were located within containment dikes. The containment dikes were made of steel-reinforced concrete and had been designed to contain the volume of the largest tank as well as precipitation from a 25-year, 24-hour event. Spills were routed to the facility's WWTP. According to the work plan, the surface water of the Indiana Harbor Ship Canal in front of the facility had an intermittent sheen and stained soils were present at the facility. However, the work plan states that the oily water and soil stains were the results of releases at other facilities and that "there is no documentation that a petroleum spill from the Breslube facility has impacted the canal" (DCN 053437).

In a July 29, 1992, letter, Safety-Kleen notified IDEM of a plan to construct a new 4-million-gallon re-refinery feed tank at the facility. According to the letter, on December 5, 1991, ECSD issued an order to show cause for violations of the discharge permit issued to the facility. As a result, Safety-Kleen was working with ECSD to establish facility improvements that would ensure compliance with ECSD's standards and conditions. The letter also mentions plans for soil remediation near old tank 52, which

occupied the proposed site for the new feed tank. Previously EPA had indicated that it would not separate tank 52 remediation activities from the rest of the corrective action activities at the facility. The letter also states that Safety-Kleen was formerly "Breslube USA" (DCN 053434).

On January 11, 1993, about 150 gallons of partially treated industrial wastewater was released to a concrete surface 20 feet from a storm sewer inlet at the Safety-Kleen facility. About 50 gallons of the wastewater was recovered. The storm sewer was diked with oil-dry to prevent the remaining wastewater from going down the sewer. Contaminated snow was taken to a containment area and processed in the WWTP (DCN 053430).

On April 8, 1997, the U.S. Department of the Interior Fish and Wildlife Service (FWS) sent a letter to EPA concerning the Safety-Kleen facility and the federally endangered peregrine falcon, which nests within the proposed maintenance dredging area for the navigation project for the Indiana Harbor Ship Canal. After reviewing a draft Phase II/III RCRA facility investigation report dated October 30, 1996, FWS believed that the Safety-Kleen facility "shares some responsibility for the existing conditions which lead to the sporadic take of the peregrine falcons in the Indiana Harbor Canal." FWS requested that the Safety-Kleen facility be remediated so that additional contaminants did not enter the surface waters of the Indiana Harbor Ship Canal (DCN 053428).

At EPA's request, Safety-Kleen completed a "Certification Regarding Potential Releases from Solid Waste Management Units" on August 9, 1996. The certification was completed for Safety-Kleen's hazardous waste management permit on July 15, 1997. Table 2-20 presents a summary of facility spills drawn from the certification (DCN 053422).

TABLE 2-20
SPILLS AT THE SAFETY-KLEEN FACILITY

Date of Spill	Material Spilled	Amount of Material Spilled (gallons)
11/16/91	Oil	200
04/27/93	Water	40
12/06/93	Waste oil	800
03/10/94	Bottoms (hazardous)	5

On October 2, 1997, a revised RCRA facility investigation report was completed for the Safety-Kleen facility. EPA indicated that the report provided sufficient information to support preparation of a corrective measures study work plan (DCN 053418).

Water Management File Room

The Safety-Kleen facility discharges its wastewater to the ECSD treatment plant. Table 2-21 lists NOV's issued to the facility by ECSD between December 30, 1994, and May 1997. Safety-Kleen was the operator of the facility during this time period.

TABLE 2-21

**NOV's ISSUED TO THE SAFETY-KLEEN FACILITY
BETWEEN DECEMBER 30, 1994 AND MAY 1997**

Date of ECSD Industrial Compliance Status Report	Wastewater Parameter Involved	Date of NOV	DCN
01/20/95	Total cyanide	12/30/94	053495
03/31/95	Oil and grease	02/06/95	053493
	Local cyanide	Unknown	053493
07/25/96	Three oil and grease, one phosphorous, and one cyanide	Unknown	053489
01/23/97	Cyanide and pH	Unknown	053485
	Cyanide and phosphorus	07/97	053485
	pH	11/97	053485, 053480
07/24/97	Total phosphorus and copper	05/97	053476, 053472

2.50.3 Other Possible PRPs

Other possible PRPs for the AOA identified during Tetra Tech's review of Safety-Kleen facility files are presented in Table 2-22. A summary of the information in the document copies pertinent to ECSD is provided in Section 2.16. Amoco and U.S. Steel have already received PRP notice letters from IDEM. ARCI, Associated Box Company, Breslube Holding Corp., Breslube USA, Inc., Clark Oil, Concrete Company, the Old Dutch Refinery, and Safety-Kleen Corporation are newly identified possible PRPs.

TABLE 2-22

OTHER PRPs ASSOCIATED WITH SAFETY-KLEEN FACILITY

Possible PRP	Pertinent Information
Amoco	Two facility lube oil spills involve property owned by Amoco (DCNs 053393 and 053399)
ARCI	Former facility operator (1972 to 1987) (DCN 053437)
Associated Box Company	Former facility owner (until 1972) (DCN 053470)
Breslube Holding Corp.	Owns Breslube and as of 1987 letter "is the legal owner and operator of the facility" (DCN 053464)

TABLE 2-22

OTHER PRPs ASSOCIATED WITH SAFETY-KLEEN FACILITY

Breslube USA, Inc.	Former facility operator (1987 to 1988) (DCNs 053437 and 053464)
Clark Oil Company	Leased the south-central portion of the facility (after 1987) (DCN 053437)
Concrete Company	Contamination was documented on the (Breslube-owned) Concrete Company property (DCN 053454)
ECSD	Operator of treatment plant that receives facility wastewater (DCNs 053437 and 053472 through 053495)
Old Dutch Refinery	Former facility operator (1930s) (DCN 053443)
Safety-Kleen Corporation	Other name used to refer to Safety-Kleen (DCN 053464)
U.S. Steel	Sent waste oil to the facility (DCN 053455)

Note:

^a Relationship to Safety-Kleen not clearly defined in facility documents

2.51 SAMOCKI BROTHERS TRUCKING COMPANY

The Samocki Brothers Trucking Company (Samocki) is a trucking and crane rental company (IDEM 1996). An inspection conducted at the Samocki facility on September 8, 1995, revealed an unpermitted transfer and processing operation for steel industrial wastes and leaking 55-gallon drums. According to IDEM, pollutants of concern at the facility include PAHs, barium, benzene, and PCBs. As of 1996, the Samocki facility case was under review by the Indiana Attorney General's office (IDEM 1996). Tetra Tech found no information in the facility files concerning the September 8, 1995, inspection.

In the document copies, Tetra Tech found that the Samocki facility is also referred to as the Birch Road site (DCN 053500).

2.51.1 Facility Location

The Samocki facility is located at 5030 Industrial Highway in Gary, Indiana (DCN 053498). This facility is located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996).

2.51.2 Summary of Pertinent Information

The pertinent information presented below on the Samocki facility was drawn from documents in the Solid and Hazardous Waste Management and Water Management file rooms.

Environmental Response File Room

No documents for the Samocki facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

On April 23, 1996, a follow-up inspection to a March 13, 1996, inspection was conducted at the Samocki facility. According to a solid waste compliance inspection report and comments, IDEM observed rusted and overpacked drums and slag piles north of the facility property. Also, several truckloads of processed industrial waste, including refractory brick, had been spread and backfilled into the pond east of the facility property (DCN 053499).

On July 25, 1996, IDEM inspectors observed a large cloud of dust near the south side of the pond at the Samocki facility. After the cloud dissipated, a dump truck was observed leaving the facility. The inspectors drove past the facility and found waste tires piled near overpacked and rusted 55-gallon drums. The inspectors also observed petroleum products leaking onto plastic sheeting and onto the ground beyond a containment area. According to a solid waste compliance inspection report and comments, an employee at the Samocki facility stated that Dennis Samocki was arranging to remove the drums (DCN 053498).

Water Management File Room

On April 17, 1991, the Grand Cal Task Force at Calumet College sent IDEM a letter concerning the Samocki facility. According to the letter, an NPDES permit was issued to Clark Materials to pump water from a sand mine at the facility to a ditch that flows into the Grand Calumet River east of the facility. IDEM later shut off the pump and cited Clark Materials for a violation. At the time of the letter, the sand mine was overflowing with water that was migrating to properties south of the facility. On April 30, 1991, IDEM inspected the Samocki facility. An IDEM letter to the Grand Cal Task Force dated July 10, 1991, states that during the inspection, no evidence was found that Samocki was discharging water to the sand mine. According to the IDEM letter, Clark Materials was the former owner of the sand mine. Also, during the inspection, problems involving oil spills and battery storage were observed; IDEM subsequently discussed these problems with Walter Samocki (DCN 053500).

In addition, the IDEM letter states that Harry Atkinson of the Indiana Office of Environmental Response had conducted groundwater monitoring and site evaluations near the Samocki facility (DCN 053500).

2.51.3 Other Possible PRPs

Clark Materials was identified as another possible PRP for the AOA during Tetra Tech's review of the Samocki facility files. Clark Materials pumped water from a sand mine on the facility property. Also, a July 10, 1991, IDEM letter states that Clark Materials is the former owner of the sand mine on the facility property (DCN 053500). IDEM has already issued a PRP notice letter to Clark Materials (IDEM 1996).

2.52 SHELL OIL COMPANY

The Shell Oil Company (Shell Oil) facility operated as a refinery from 1926 to 1940. The refinery produced gasoline, kerosene, gas oil, fuel oil, road oil, and asphalt. Since 1940, the facility has operated as a bulk storage terminal. Shell Oil purchased the facility property in 1926, and as of 1994, Shell Oil still owned the property (DCN 053562). The facility is operated and maintained by Shell Pipe Line Corporation (DCN 053517).

2.52.1 Facility Location

The Shell Oil facility is located at 2400 Michigan Street in Hammond, Indiana (DCN 053562). This facility is located in Priority Reach D, Kennedy Avenue to 151st Street. Also, the Shell Oil facility is an industrial discharger to the ECSD, which is located in Priority Reach E, the fork of the East-West Branch of the Indiana Harbor Ship Canal to the west end of Roxana Marsh (IDEM 1996). The Grand Calumet River borders the facility on the north (DCN 053517).

2.52.2 Summary of Pertinent Information

The pertinent information presented below on the Shell Oil facility was drawn from documents in the Environmental Response and Water Management file rooms. In addition, pertinent documents concerning the Shell Oil facility were found in the Viking facility file in the Hazardous and Waste Management file room.

Environmental Response File Room

The Shell Oil facility consists of three properties designated as the Main, North, and East properties. The Main property is the product terminal, the North and East properties are product storage areas (DCN 053517). The North property was used as a dump for refinery waste, rubble from demolished buildings, and debris such as metal pipes and concrete (DCN 053503). Soils under the facility consist of fine- to medium-grained sands underlain by a thick layer of glacial till. Groundwater flow beneath the facility is to the north toward the Grand Calumet River (DCN 053517).

The Shell Oil facility produced gasoline, kerosene, gas oil, fuel oil, road oil, and asphalt from 1926 to 1940. According to an environmental assessment report completed by Engineering-Science, Inc. (ES), in July 1990, some by-product gases were sold to public utilities such as NIPSCO, and coke by-product was sold to "heavy industries" in northwest Indiana. Some of the by-product material was landfilled on site (DCNs 053517 and 053552).

In 1980, about 2,000 cubic yards of a tar-like material was excavated at the Shell Oil facility and sent to Wheeler Landfill. Analytical results for the excavated material indicated that it should be classified as a nonhazardous waste. ES estimates that tar-like material was also removed from the facility during the 1960s and 1970s (DCN 053517).

In February 1989, Law Engineering performed a site assessment at the Shell Oil facility. During the assessment, 33 groundwater monitoring wells were installed at the facility, and sampling of groundwater and soils was conducted. Sample analytical results indicated that dissolved and separate-phase hydrocarbons were present in portions of the facility. Also, Law Engineering observed asphaltic material on the groundwater surface extending into the Grand Calumet River bank near a suspected inactive disposal area (DCN 053517).

From January to April 1990, ES conducted an environmental assessment of the Shell Oil facility. During January 1990, the assessment included the following activities (DCN 053517):

- Excavation of tar-like material exposed on the surface of the North property
- Sampling during excavation activities. The sampling indicated that the free product encountered was diesel fuel.

- Sampling of three drums filled with clear liquid and two drums filled with a black, tar-like substance. Sample analyses revealed that the clear liquid was similar to the river water and that the black, tar-like substance was similar to the excavated tar-like material.
- Collection of four sediment and water samples from the Grand Calumet River. Total petroleum hydrocarbons (TPH) were detected in the sediment and water samples. The highest TPH concentration in sediment was detected in a sample collected near the confluence of a small stream with the East Branch of the Grand Calumet River. The sediment samples also contained base-neutral and acid extractables (BNA) and BTEX.

During February and March, 1990, the environmental assessment included a soil-gas survey, soil boring, and monitoring well installation. A soil-gas survey was conducted by ES in February. Benzene, toluene, and o-xylenes were present in several soil-gas samples; ethylbenzene and chlorinated volatile organics were also "potentially" present. In March, 21 soil borings were drilled at the facility, and 11 soil borings were completed as monitoring wells. Soil samples collected contained organic contaminants, TPH, and BTEX. Groundwater samples collected from the monitoring wells in April 1990 contained TPH and BTEX (DCN 053517).

Conclusions stated in a June 1990 ES report on the North property interim surficial cleanup are summarized below (DCN 053552).

- Aerial photographs suggest that three former disposal ponds existed in the area of the tar-like material encountered during the field investigations.
- Sample analyses indicate that the tar-like material is probably a refinery product such as petroleum, coke, or residuals.
- Sample analyses indicate that soils adjacent to the tar-like material have been affected.
- About 8,000 to 13,000 cubic yards of tar-like material and impacted soils remain at the facility.

Conclusions regarding the environmental assessment stated in a July 1990 ES report are summarized below (DCN 053517).

- Soils at the facility have been affected by TPH and BTEX contamination.
- Groundwater at the facility has been affected by TPH and BTEX contamination.
- Impacted groundwater does not appear to be migrating off site. *- based on? why boom? along river?*
- Surface water does not appear to have been affected.
- Elevated levels of TPH and BTEX in Grand Calumet River sediments may be attributed to numerous industrial sources in the area.

Between August 20 and November 9, 1990, ES implemented a program to remove tar-like material and impacted soils because (1) during periods of low water levels, seeps of the tar-like material were observed

near the Grand Calumet River and (2) several past attempts at removal of surficial materials had limited success. ES excavated about 19,950 cubic yards of nonhazardous tar-like material and impacted soil at the Shell Oil facility. The excavated materials were landfilled by two Shell Oil-approved disposal companies. After the removal of the tar-like material, the excavated area was restored as an open water area. A 50- by 150-foot strip of land that might contain residual contamination was left unaddressed (DCN 053503).

Solid and Hazardous Waste Management File Room

No pertinent documents were found in the Shell Oil facility files in the Solid and Hazardous Waste Management file room; however, a document pertinent to Shell Oil was found in the Viking Engineering Company, Inc. (Viking), facility files in this file room.

On August 3, 1994, the Viking facility sent a notice of a citizen suit to Shell Oil. Viking had purchased property located at 2300 Michigan Street in Hammond, Indiana, from Shell Oil in 1979. Subsequently Viking discovered substantial petroleum contamination of soils on this property. Viking's investigations indicated that Shell Oil's past operations on the property were the source of the contamination. By means of the notice of a citizen suit, Viking was seeking all relief available, including a court order compelling Shell Oil to immediately and fully remediate all environmental contamination on the 2300 Michigan Street property (DCN 054065). Tetra Tech does not know how the 2300 Michigan Street property is related to the Shell Oil facility at 2400 Michigan Street.

Water Management File Room

On November 15, 1994, Shell Oil sent IDEM a NOI letter to comply with 327 IAC 15-9 for wastewater discharge associated with petroleum terminals. According to the NOI, the Shell Oil facility discharge would be storm water and hydrostatic test water, and these waters would be discharged to the Grand Calumet River (DCN 053562).

The Shell Oil facility is a significant industrial user discharging wastewater to the ECSD treatment plant. According to a March 31, 1995, ECSD industrial compliance status report, the facility was in "total compliance" (DCN 054588). According to a January 25, 1996, ECSD industrial compliance status report, facility outfall 591 stopped discharging wastewater to ECSD treatment plant. A pretreatment plant at the facility was dismantled (DCN 053558).

2.52.3 Other Possible PRPs

Other possible PRPs for the AOA identified in the Shell Oil facility files are summarized in Table 2-23. A summary of the information in the document copies pertinent to ECSD is provided in Section 2.16. A summary of the information in the document copies pertinent to the Viking facility is provided in Section 2.61. Shell Pipe Line Corporation is a newly identified possible PRP.

TABLE 2-23

OTHER POSSIBLE PRPs ASSOCIATED WITH SHELL OIL FACILITY

Possible PRP	Pertinent Information
ECSD	Operator of treatment plant that receives facility wastewater (DCN 053558)
Shell Pipe Line Corporation	Operator of facility (The relationship between Shell Oil and Shell Pipe Line Corporation is not clear in the documents copied by Tetra Tech.) (DCN 053517)
Viking	Owner of the property purchased at 2300 Michigan Street in Hammond, Indiana, from Shell Oil in 1979 (DCN 054065)

2.53 SHELL OIL COMPANY GASOLINE STATIONS

Based on Tetra Tech's review of Shell Oil files in IDEM's file rooms and on guidance from IDEM, pertinent spill or release information is available for eight Shell Oil gasoline stations potentially present in the AOA. This section summarizes the pertinent information found for the eight gasoline stations.

2.53.1 Facility Location

Following are the addresses of the eight Shell Oil gasoline stations:

- 4601 West 5th Avenue, Gary
- 3501 Broadway, Gary
- 5390 15th Street, Gary
- 4890 Broadway, Gary
- 4492 Cleveland Street, Gary
- 3499 Grant Street, Gary
- 2100 East Columbus Drive, East Chicago
- 4804 Indianapolis Boulevard, East Chicago

2.53.2 Summary of Pertinent Information

The pertinent information presented below on the eight Shell Oil gasoline stations was drawn from documents in the Environmental Response and Water Management file rooms.

Environmental Response File Room

Table 2-24 contains information on spills or releases that have occurred at the eight Shell Oil gasoline stations.

TABLE 2-24

SPILLS OR RELEASES AT SHELL OIL GASOLINE STATIONS

Gasoline Station Location	Spill or Release Date	Material Spilled or Released	Amount Spilled or Released (Gallons)	Area Affected	Cleanup	DCN
4601 West 5th Avenue, Gary	09/01/87 (Estimated start date)	Regular unleaded gasoline	765	6,300 square feet	<ul style="list-style-type: none"> • At time of report, no product recovered • On October 6, 1987, observation wells installed 	053568, 053565
3501 Broadway, Gary	12/03/87 (Discovery date)	Unleaded gasoline	Unknown	<ul style="list-style-type: none"> • 100 square feet • 1/4 inch of free-phase hydrocarbons in observation well 2 	<ul style="list-style-type: none"> • About 1/8 gallon recovered • Contaminated soil removed • Observation well bailed, product removed 	053595, 053593, 053581
5390 15th Street, Gary	11/18/87 (Discovery date)	Gasoline	Unknown	1/8 inch of hydrocarbons in observation well	Observation well bailed	053608
4890 Broadway, Gary	08/25/87	Super unleaded gasoline	1000	<ul style="list-style-type: none"> • 1,000 square feet • Hydrocarbons in four observation wells 	Recovery from four observation wells on a daily basis	053627
4492 Cleveland Street, Gary	07/06/88 (Notification date; release date unknown)	Gasoline	Unknown	Unknown (site assessment revealed gasoline in soil)	<ul style="list-style-type: none"> • Monitoring wells installed • Four USTs removed 	053632
3499 Grant Street, Gary	02/11/87 (Discovery date)	Diesel fuel	Unknown	1 square foot Product observed in nearby monitoring well	<ul style="list-style-type: none"> • About 1 gallon recovered • Quality Pump Service Co. contracted to remove product from monitoring wells 	053682

TABLE 2-24 (Continued)

SPILLS OR RELEASES AT SHELL OIL GASOLINE STATIONS

Gasoline Station Location	Spill or Release Date	Material Spilled or Released	Amount Spilled or Released (Gallons)	Area Affected	Cleanup	DCN
2100 East Columbus Drive, East Chicago	12/01/88 (Discovery date) 2/05/88 (Notification date)	Gasoline	1,500 (Estimate on 12/15/88)	<ul style="list-style-type: none"> • Station sump wells • 1990 report indicates a northern product plume limit 450 to 500 feet north of the gasoline station 	<ul style="list-style-type: none"> • Quality Pump Service Co. pumped 3,200 gallons of product from wells and tank • Visually contaminated soil removed with all on-site USTs • ES collected soil and water samples and installed a continuous recovery system • As of September 12, 1989, 14,000 gallons of product recovered • ES completed a corrective action plan and summary of remedial activities report • In February 1995, site inspection conducted by Furgo Midwest, Inc. • In February 1998, groundwater sampling conducted by Quality Environmental Professionals, Inc. 	053677, 053669, 053658, 053653, 053644, 053642, 053637
	5/25/89 (Notification date)	No. 2 premium unleaded gasoline	Unknown	Unknown	Recovery system installed	053674
4804 Indianapolis Boulevard, East Chicago	1/13/88 (Discovery date)	Leaded gasoline	About 5	About 20 cubic feet of soil	Contaminated soil excavated and disposed of	053686

Solid and Hazardous Waste Management File Room

No pertinent documents regarding the eight Shell Oil gasoline stations were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

Two of the Shell Oil gasoline stations, one at 4601 West 5th Avenue in Gary (DCN 053572) and one at 3501 Broadway in Gary (DCN 053597), discharge wastewater to the GSD treatment plant. According to the 1994 GSD annual report, neither gasoline station is remediating the property groundwater; therefore, there are no discharges of product to the GSD collection system. The two gasoline stations are listed in the GSD category of "always compliant."

2.53.3 Other Possible PRPs

GSD was identified as another possible PRP for the AOA during Tetra Tech's review of the Shell Oil gasoline station files. Two of the Shell Oil gasoline stations, one at 4601 West 5th Avenue in Gary (DCN 053572) and one at 3501 Broadway in Gary (DCN 053597), discharge wastewater to the GSD treatment plant. A summary of the information in the document copies pertinent to GSD is provided in Section 2.23.

2.54 ST. MARY MEDICAL CENTER

The St. Mary Medical Center is now the Northwest Family Hospital (DCN 054594). St. Mary Medical Center was included in the file review but no pertinent documents were identified. Pertinent information concerning the Northwest Family Hospital is presented in Section 2.41.

2.55 TRI STATE COACH LINES, INC.

The Tri State Coach Lines, Inc. (Tri State) facility is a bus maintenance facility. Before Tri State operated at the facility, the facility was an automobile dealership (DCN 053695).

2.55.1 Facility Location

The Tri State facility is located at 2101 West 37th Avenue in Gary, Indiana (DCN 053695). This facility is an industrial discharger to GSD located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996). According to a July 1, 1994, leaking UST site investigation report (SIR), the owner of the facility is Cardinal Service, Inc., located at 202 East Weislow in Middlebury, Indiana. Tri State leases the facility property for its bus maintenance operations (DCN 053695).

2.55.2 Summary of Pertinent Information

The pertinent information presented below on the Tri State facility was drawn from documents in the Environmental Response and Water Management file rooms.

Environmental Response File Room

On July 1, 1994, Advanced Pollution Technologists Limited (APT) submitted to IDEM a leaking UST SIR for the Tri State facility. According to the SIR, the Tri State facility had six USTs installed prior to 1980.

three 4,000-gallon, diesel fuel USTs; two 4,000-gallon, gasoline USTs; and one 1,000-gallon, gasoline UST. Soil samples collected after the USTs were registered with IDEM on June 1, 1994, indicate that a release occurred from the USTs (the sampling dates are not indicated in the document copies). Between April and June, 1994 APT installed six monitoring wells at the facility. Soils encountered included fine- to medium-grained sands, and water was encountered between 1 and 5 feet bgs. Soil samples collected by APT during well installation indicated that subsurface soils near the USTs had not been impacted by petroleum constituents. Groundwater samples collected by APT contained levels of benzene and BTEX constituents above IDEM cleanup objectives. As a result, a UST release was reported to IDEM on May 14, 1994; the release was designated as Incident No. 94-05534. In the SIR, APT recommends that the facility groundwater impact be defined and a corrective action plan be developed (DCN 053695).

According to the SIR, a manmade drainage ditch extends along the southwest corner of the facility and flows into the Little Calumet Drainage Ditch to the northwest. Lake Michigan is located 4 miles to the north (DCN 053695).

The SIR refers to a separate investigation concerning the facility's main building area; however, Tetra Tech found no further information related to this investigation in the Tri State facility files (DCN 053695).

Solid and Hazardous Waste Management File Room

No documents for the Tri State facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

On February 6, 1995, APT submitted a NOI letter to IDEM concerning the Tri State facility's plans to pump groundwater containing BTEX through an air stripper. According to the NOI letter, all BTEX levels in the air stripper effluent would meet drinking water standards. The NOI letter indicates that the effluent from the air stripper would be piped to a storm water pond located on the north side of 37th Avenue (NPDES Outfall No. 001). The Little Calumet River, which is located about 1 mile north of the Tri State facility, was believed to be the ultimate receiving stream for the effluent (DCN 053716).

2.55.3 Other Possible PRPs

Cardinal Service, Inc., was identified as another possible PRP for the AOA during Tetra Tech's review of the Tri State facility files. Cardinal Service, Inc., of Middlebury, Indiana, is the owner of the facility (DCN 053695). Cardinal Service, Inc., is a newly identified possible PRP.

2.56 TRUCKSTOPS OF AMERICA, INC.

The Truckstops of America, Inc. (TOA), facility is an automobile and truck fuel sales station. The facility also services trucks and trailers. The facility property contains the following 13 USTs: three for gasoline, four for diesel fuel, three for bulk oil, one for used oil, and two that are abandoned (DCNs 053727, 053737, and 053751). Throughout the facility documents reviewed by Tetra Tech, TOA is referred to as the operator of the TOA facility. However, a November 3, 1995, letter from IDEM to BP Exploration & Oil (BP Oil) states that "BP Oil and Truckstops of America are now totally separate operating entities with BP Oil having specific responsibility for the containment of the free product and contamination (DCN 053751). The relationship between TOA and BP Oil is not made clear in the facility documents reviewed by Tetra Tech.

2.56.1 Facility Location

The TOA facility is located at 2510 Burr Street in Gary, Indiana. The TOA facility occupies about 30 acres of developed land in the northwest quadrant of the Interstate 80/94 and Burr Street interchange (DCN 053763). The facility is about 0.75 mile north of the Little Calumet River and 2.5 miles south of the Grand Calumet River (DCN 053804). The TOA facility is located in Priority Reach B, Pennsylvania Railroad Bridge to Cline Avenue (IDEM 1996).

2.56.2 Summary of Pertinent Information

The pertinent information presented below on the TOA facility was drawn from documents in the Environmental Response, Solid and Hazardous Waste Management, and Water Management file rooms.

Environmental Response File Room

On April 26, 1984, ISBH was notified of an approximately 200-gallon release of oil from the TOA facility to a roadside ditch. The source of the release was at the facility, and the release was halted. A contaminant removal action, including oil and soil removal, was completed by the facility (DCNs 053884 and 053886).

Also during April 1984, the Gary Health Department reported oil in the drainage ditches around the south and east sides of the TOA facility. The facility reportedly found and addressed the source of the oil leak. In another incident, oil was reported in the ditches surrounding the facility in December 1988 (DCN 053871).

On December 1, 1986, an unknown amount of gasoline was found to have been released from an underground storage system at the TOA facility. The facility discovered gasoline in subsurface soils during excavation activities for a new tank. The facility stated that it would proceed with a cleanup of the release (DCN 053882).

In February 1989, articles in the *Valparaiso Vidette Messenger*, *Hammond Times*, *Indianapolis Star*, and *Gary Post-Tribune* noted that IDEM fined the TOA facility \$25,000 for allegedly discharging diesel fuel into ditches bordering the facility property. These ditches discharge to the Little Calumet River. In addition, IDEM imposed a \$500 per day fine until the facility cleaned up the ditches (DCN 053862).

In February 1989, two initial incident report logs were filed by IDEM that report a release of petroleum products from the TOA facility to a drainage ditch that discharges to the Little Calumet River. This release led to IDEM's issuing an emergency order dated February 22, 1989, to the facility. The order specified that the facility should cease and desist its discharge of fuel into the waters of the state (DCNs 053867 and 053869).

In a March 3, 1989, briefing, IDEM noted that soil at the TOA facility had been heavily saturated with diesel fuel and oil and would require extensive cleanup. Maecorp Incorporated (Maecorp) was the cleanup contractor for the facility and had initiated activities to stop downstream contaminant movement in the affected ditch. TOA was noted as being very willing to cooperate (DCN 053862).

During 1989 and 1990, Maecorp performed soil and groundwater investigations at the TOA facility. Benzene was detected in two groundwater samples at concentrations of 77 and 14 ppb. These

concentrations exceeded the IDEM action level for groundwater (DCNs 053815, 053824, 053727, and 053737).

In February 1991, Ontario Environmental, Inc. (Ontario), performed a preliminary site investigation that included the TOA facility. During Ontario's investigation, TPH was detected in samples collected from a ditch near Burr Street. This ditch and the sampling locations were downgradient from the TOA facility, and the presence of TPH was attributed to the facility (DCN 053804).

In 1992 and 1993, Warzyn, Inc. (Warzyn), performed soil and groundwater investigations at the TOA facility. During Warzyn's soil investigation, the concentration of TPH in one soil sample was found to exceed the IDEM action level. During Warzyn's groundwater investigation, (1) free-phase hydrocarbons were found in three wells, (2) concentrations of benzene in samples from four wells exceeded the IDEM action level, (3) the concentration of ethylbenzene in a sample from one well exceeded the IDEM action level, and (4) concentrations of total SVOCs in samples from two wells exceeded the IDEM action level (DCNs 053727, 053737, 053773, and 053795).

On May 15, 1993, about 70 gallons of diesel fuel was released to a blacktop surface at the TOA facility. Environmental Clean-up Contractor Service, Inc., was used to respond to the release and completed the cleanup (DCN 053784).

From 1993 to 1995, Dames & Moore (D&M) performed soil and groundwater investigations at the TOA facility. During D&M's soil investigation, the TPH concentrations in eight soil samples exceeded the IDEM action level. During D&M's groundwater investigation, (1) free-phase hydrocarbons were found in three wells, (2) concentrations of benzene in samples from two wells exceeded the IDEM action level, (3) the concentration of ethylbenzene in a sample from one well exceeded the IDEM action level, and (4) concentrations of total SVOCs in samples from two wells exceeded the IDEM action level (DCN 053727 and 053737).

A November 3, 1995, letter from IDEM to BP Oil notes the following regarding the TOA facility (DCN 053751):

- Since 1989, repeated incidents of free product recovery have occurred.
- Gasoline spillage has been detected by means of monitoring well sampling.
- A storm drain system may be acting as a discharge zone.
- Potential problems exist with drainage of surface water into open drains leading to the GSD treatment plant.
- BP Oil and the TOA facility are totally separate operating entities, with BP Oil having specific responsibilities with regard to remediation of free product and contamination.

A December 1995 corrective action plan for the TOA facility prepared by D&M identifies VOCs, SVOCs, and TPH as soil and groundwater contaminants at the facility. The area of groundwater contamination at the facility is about 125,000 square feet in size. Groundwater investigations have shown that the layer of free product ranges from 0 to 5 feet in thickness (DCN 053742).

In a May 1997 summary report prepared for the TOA facility, D&M concludes that a diesel fuel release occurred at the facility based on information gathered during site investigations. In addition, D&M found free-phase hydrocarbons and found concentrations of benzene, ethylbenzene, and total SVOCs exceeding IDEM action levels in groundwater at the facility (DCN 053727).

On October 7, 1997, less than 25 gallons of gasoline was released to soil at the TOA facility. This release was the result of trenching activities that cut a gasoline product line at the facility. About 5 cubic yards of impacted soil was removed from the release area (DCN 053723).

Solid and Hazardous Waste Management File Room

A June 17, 1987, complaint investigation by IDEM revealed oil in a ditch adjacent to the TOA facility. The situation was referred to IDEM's Office of Water Management. In addition, IDEM received complaints that an abandoned tanker at the facility was leaking. The tanker and its contents were then removed from the facility. The contents of the tanker were tested and were found to contain hydrochloric acid and PCBs (DCNs 053888, 053891, and 053893).

On January 22, 1988, IDEM received a report of an oil discharge from the TOA facility to a drainage ditch. A local resident complained that the facility was periodically dumping what appeared to be diesel fuel into a ditch that runs along Interstate 80. The situation was referred to IDEM's Office of Water Management (DCN 053888).

Water Management File Room

On February 24, 1995, GSD sent a letter of violation to the TOA facility. The letter charges TOA with significant noncompliance for oil and grease between March 1 and September 31, 1994, and with failure to provide self-monitoring data (DCNs 053896 and 053898).

The TOA facility is a significant industrial discharger to the GSD treatment plant. TOA received letters of violation from GSD in 1992 for high BOD, COD, TSS, phosphorus, ammonia, and oil and grease levels in facility wastewater (IDEM 1996). Tetra Tech found no information related to these matters in the Water Management file room, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in this file room.

2.56.3 Other Possible PRPs

GSD and BP Oil were identified as other possible PRPs for the AOA during Tetra Tech's review of TOA facility files. The GSD treatment plant receives wastewater from the facility (DCNs 053896, 053898, and 053751). A summary of the information in the document copies pertinent to the GSD is provided in Section 2.23. BP Oil had specific responsibilities with regard to remediation of free product and contamination at the facility (DCN 053751). BP Oil is a newly identified possible PRP.

2.57 UNION TANK CAR COMPANY

The Union Tank Car Company (Union Tank) facility manufactures and repairs railroad tank cars. Union Tank owns and operates the facility (DCN 053984).

2.57.1 Facility Location

The Union Tank facility is located at 300 West 151st Street in East Chicago, Indiana (DCN 053909). This facility is located on the west bank of the Indiana Harbor Ship Canal in Priority Reach E, the fork of the East-West Branch of the Indiana Harbor Ship Canal to the west end of Roxana Marsh, and in Priority Reach G, 151st Street to Columbus Drive (IDEM 1996).

2.57.2 Summary of Pertinent Information

The pertinent information presented below on the Union Tank facility was drawn from documents in the Environmental Response and Water Management file rooms.

Environmental Response File Room

On June 17, 1987, about 344 gallons of an acid solution containing nitric acid, hydrofluoric acid, potassium ferrocyanide, and water was released into a parking lot storm sewer that ultimately discharges to the Little Calumet River. The remedial action included vacuuming acid from the parking lot and diluting the acid in the storm sewer with large amounts of water. According to Union Tank, SET Environmental, Inc., a contractor working for Union Tank, was passivating the interiors of facility tanks and was responsible for the release and subsequent notification of the proper authorities (DCNs 053952 and 053973).

On August 5, 1987, about 7 gallons of nitric acid and hydrofluoric acid from the Union Tank facility was released into the East Chicago, Indiana sanitary sewer (DCNs 053947, 053949, 053951, and 053962).

On February 22, 1988, about 14,050 gallons of No. 6 fuel oil was released to a containment area around Tank No. 7562 at the Union Tank facility. During the cleanup, about 500 gallons of oil and water and 120 cubic yards of contaminated debris were removed from the containment area (DCNs 053938, 053940, 053942, 053944, and 053945).

On July 22, 1988, 13 gallons of hydraulic oil was released into a storm sewer at the Union Tank facility. All this oil was contained in the sewer's sump and was subsequently pumped into a storage barrel for disposal (DCNs 053934 and 053936).

On November 3, 1993, less than 5 gallons of oil and an unidentified blue rock were discovered in soils during sewer rerouting excavation activities at the Union Tank facility. The source of the oil was the boilerhouse of Plant #1 at the facility. The source of the blue rock was not identified. Cleanup efforts involved excavation of oily soil and the blue rock (DCNs 053909, 053910, 053912, and 053930).

Solid and Hazardous Waste Management File Room

No pertinent documents for the Union Tank facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

EPA filed an administrative complaint against Union Tank for violations of the Clean Water Act. The violations involved illegal discharge of pollutants to the ECSD treatment plant over an extended period. From 1987 to 1993, ECSD cited Union Tank for pretreatment system discharge exceedances involving

silver, total phosphorus, mercury, copper, iron, and oil and grease. In addition, EPA filed and settled a TSCA case involving a transformer containing PCB against Union Tank (IDEM 1996). Tetra Tech found no information related to these incidents in the Water Management file room, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in this file room.

A January 28, 1994, ECSD semiannual industrial compliance report, for July 1993 through December 1993 notes periodic Union Tank facility exceedances of ECSD pretreatment requirements for oil and grease and phosphorus (DCNs 054005, 054016, and 054018).

On May 24, 1994, the U.S. Department of Justice issued notice of a suit against Union Tank for illegal discharges of pollutants to the ECSD treatment plant over an extended period. Specifically, the facility exceeded ECSD pretreatment requirements for oil and grease, silver, copper, mercury, and iron (DCN 053984).

A July 24, 1997, ECSD industrial compliance status report states that the Union Tank facility was sent an NOV letter for an oil and grease exceedance at Outfall 341 that occurred in May 1997 (DCN 053980). The Union Tank facility was in "total compliance" according to ECSD industrial compliance status reports dated July 25, 1996 (DCN 054601) and October 23, 1997 (DCN 054597).

2.57.3 Other Possible PRPs

ECSD and SET Environmental, Inc., were identified as other possible PRPs for the AOA during Tetra Tech's review of Union Tank facility files. The ECSD treatment plant receives industrial discharge from the facility (IDEM 1996; DCNs 054005 and 054016). A summary of the information in the document copies pertinent to ECSD is provided in Section 2.16. SET Environmental, Inc., was allegedly responsible for a June 17, 1987, spill at the facility (DCNs 053952 and 053973). SET Environmental, Inc., is a newly identified possible PRP.

2.58 UNITED RAIL SERVICES

The United Rail Services (URS) facility provides cleaning and maintenance services for railroad cars, including tank cars.

2.58.1 Facility Location

The URS facility is located at 1150 East 141st Street in East Chicago, Indiana (DCN 054020). This facility is an industrial discharger to the ECSD, which is located in Priority Reach E, the fork of the East-West Branch of the Indiana Harbor Ship Canal to the west end of Roxana Marsh (IDEM 1996).

2.58.2 Summary of Pertinent Information

The pertinent information presented below on the URS facility was drawn from documents in the Environmental Response and Water Management file rooms.

Environmental Response File Room

On January 21, 1991, IDEM was notified of a release of liquefied petroleum gas that led to an explosion at the URS facility (DCN 054020).

Solid and Hazardous Waste Management File Room

No pertinent documents regarding the URS facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

An April 25, 1996, ECSD industrial compliance status report states that the URS facility signed an agreed order with ECSD on February 10, 1994. The agreed order contains construction milestones for new treatment equipment, self-monitoring requirements, and certified operator requirements for the facility. The agreed order also contains a date for achieving phosphorus compliance, achieving oil and grease compliance, and completing a metal evaluation study. The facility committed oil and grease violations in February and March 1996 because excessive amounts of commodity were rinsed out of tankers and railcars (DCN 054038).

A July 25, 1996, ECSD industrial compliance status report states that the URS facility committed oil and grease and ammonia violations and received NOV letters for these violations during the second quarter of 1996. No explanation of these violations is given in the report (DCN 054034).

A January 23, 1997, ECSD industrial compliance status report states that the URS facility committed two oil and grease violations involving Outfall 521 in July 1996. One of the violations was the result of the failure of a mixer in a neutralization tank. The report does not explain the other violation. The facility was sent an NOV letter for an ammonia release in August 1996. The ammonia was released from a trailer being worked on in a tank wash area (DCN 054030).

An April 25, 1997, ECSD industrial compliance status report states that the URS facility committed five oil and grease violations involving Outfall 521 in December 1996. The URS facility was sent an NOV letter for one of these five violations, which were the result of a chloropolybutane car leaking into a rail wash pit (DCN 054026).

A July 24, 1997, ECSD industrial compliance status report states that the URS facility was sent an NOV letter for two oil and grease violations involving Outfall 521 that occurred in January 1997. These violations were the result of a de-icer trailer being washed at the facility. In February 1997, the facility received an NOV letter from ECSD for two chromium violations involving Outfall 521. These violations may have been caused by the cleaning of a trailer that had contained a large amount of chromium. In June 1997, the facility received an NOV letter from ECSD for one fluoride violation involving Outfall 521. The fluoride violation was attributed to an equipment malfunction (DCN 054022).

The URS facility was in "total compliance" according to ECSD industrial compliance status reports dated March 31, 1995 (DCN 054609) and October 23, 1997 (DCN 054605).

2.58.3 Other Possible PRPs

ECSD was identified as another possible PRP for the AOA during Tetra Tech's review of URS facility files. The facility is a significant industrial discharger to the ECSD treatment plant (DCNs 054022, 054026, 054030, 054034, and 054038). A summary of the information in the document copies pertinent to ECSD is provided in Section 2.16.

2.59 UNITED STATES GYPSUM COMPANY

The operations conducted at the United States Gypsum Company (U.S. Gypsum) facility are not identified in the documents photocopied for the PRP search.

2.59.1 Facility Location

The U.S. Gypsum facility is located at 3501 Canal Street in East Chicago, Indiana (DCN 054042). This facility is located in Priority Reach H, Columbus Drive to Railroad Overpass and the Lake George Branch of the IHSC. Also, the U.S. Gypsum facility is an industrial discharger to the ECSD, which is located in Priority Reach E, the fork of the East-West Branch of the Indiana Harbor Ship Canal to the west end of Roxana Marsh (IDEM 1996).

2.59.2 Summary of Pertinent Information

The pertinent information presented below on the U.S. Gypsum facility was drawn from documents in the Water Management file room.

Environmental Response File Room

No pertinent documents regarding the U.S. Gypsum facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

No documents for the U.S. Gypsum facility were found in the Hazardous Waste Management file room.

Water Management File Room

An IDEM NPDES authorization signed on March 13, 1996, granted the U.S. Gypsum facility a permit to discharge storm water and noncontact cooling water to the Lake George Canal. The facility does not have a WWTP (DCN 054042).

A January 25 and April 25, 1996, ECSD industrial compliance status report state that the U.S. Gypsum facility committed two total phosphorus violations (four in total) because of a malfunctioning controller for a boiler blowdown unit (DCN 054631 and 054038).

The U.S. Gypsum facility was in "total compliance" according to ECSD industrial compliance status reports dated March 31, 1995 (DCN 054635), July 25, 1996 (DCN 054627), January 23, 1997 (DCN 054623), April 25, 1997 (DCN 054618), July 24, 1997 (DCN 054615), and October 23, 1997 (DCN 054611).

2.59.3 Other Possible PRPs

ECSD was identified as another possible PRP for the AOA during Tetra Tech's review of U.S. Gypsum facility files. The facility is an industrial discharger to the ECSD treatment plant (DCN 054038). A summary of the information in the document copies pertinent to ECSD is provided in Section 2.16.

2.60 UNITED STATES REDUCTION COMPANY

The operations conducted at the United States Reduction Company (U.S. Reduction) facility are not identified in the documents photocopied for the PRP search. However, U.S. Reduction letterhead stationery identifies the company as being "alloyers and refiners" (DCN 054046).

2.60.1 Facility Location

The U.S. Reduction facility is located at 4610 Kennedy Avenue in East Chicago, Indiana (DCN 054052). This facility is an industrial discharger to the ECSD, which is located in Priority Reach E, the fork of the East-West Branch of the Indiana Harbor Ship Canal to the west end of Roxana Marsh (IDEM 1996).

2.60.2 Summary of Pertinent Information

The pertinent information presented below on the U.S. Reduction facility was drawn from documents in the Solid and Hazardous Waste Management and Water Management file rooms.

Environmental Response File Room

No documents for the U.S. Reduction facility were found in the Environmental Response file room.

Solid and Hazardous Waste Management File Room

According to a 1976 letter from U.S. Reduction to ISBH, general plant refuse generated each year at the U.S. Reduction facility consisted of about 2,800 tons of paper, crates, dunnage, and refractory wastes. Slag was generated by smelting furnaces, and about 40,000 pounds of filter cake solids was generated each day from a salt recovery process. The salt recovery waste was disposed of at the "Gary Land Development." Also, the facility generated about 38,600 tons per year of baghouse dust and residue dust from milling of aluminum drosses into aluminum concentrates (DCN 054046).

According to a letter from U.S. Reduction to ISBH dated December 6, 1976, the wastes generated by the U.S. Reduction facility were transported and disposed of by Industrial Disposal. The letter also states that all wastes generated by the U.S. Reduction facility would be classified as nontoxic (DCN 054046).

A November 16, 1979, letter from U.S. Reduction to IDEM requests approval to dispose of waste at the "Gary Land Development." The letter indicates that the facility generated 150,000 to 200,000 pounds of slag chunks and 400,000 to 550,000 pounds of milling dust each day. The waste hauler is identified as Industrial Disposal (DCN 054049).

On November 19, 1979, an ISBH memorandum was written concerning aluminum oxide disposed of at the "Gary Development Landfill." The memorandum states that the aluminum oxide contained 35 to 40 percent chloride salt and produced an exothermic reaction when mixed with refuse. The memorandum further states that disposal of aluminum oxide was not approved in an IDEM letter dated June 16, 1976. ISBH notified U.S. Reduction that the unapproved material was not to be disposed of at the "Gary Development Landfill" (DCN 054048).

On March 28, 1983, ISBH notified the U.S. Reduction facility that the "Gary Development Landfill" would be able to accept U.S. Reduction's special waste materials. As a result, U.S. Reduction had to

update its estimate of 300 tons per day of milling dust and slag requiring disposal, an estimate approved by ISBH on November 27, 1979 (DCN 054052).

Water Management File Room

The U.S. Reduction facility discharges its wastewater to the ECSD treatment plant. According to ECSD industrial compliance status reports dated January 25 and April 25, 1996, the facility was given an NOV for elevated levels of copper in its wastewater (DCNs 054057 and 054650). Also, an ECSD industrial compliance status report dated April 25, 1997, indicates that the facility was given an NOV for elevated copper and pH levels (DCN 054641). The facility was in total compliance according to ECSD industrial compliance status reports dated March 31, 1995 (DCN 054658), and July 25, 1996 (DCN 054646).

According to an ECSD industrial compliance status report dated July 24, 1997, the U.S. Reduction facility was given an NOV for elevated copper and pH levels in Outfall 441 wastewater in January 1997. The elevated copper and pH levels were attributed to a sewer line collapse that released suspended solids into the sewer. The sewer was repaired and cleaned. At the time of the ECSD industrial compliance status report, the facility was in total compliance (DCN 054053).

2.60.3 Other Possible PRPs

Other possible PRPs for the AOA identified in the U.S. Reduction facility files are summarized in Table 2-25. A summary of the information in the document copies pertinent to ECSD is provided in Section 2.16. A summary of the information in the document copies pertinent to the "Gary Development Sanitary Landfill"/"Gary Development Landfill"/"Gary Land Development" (GDC) facility is provided in Section 2.20. A summary of the information in the document copies pertinent to the Industrial Disposal facility is provided in Section 2.28.

TABLE 2-25

OTHER POSSIBLE PRPs ASSOCIATED WITH U.S. REDUCTION FACILITY

Possible PRP	Pertinent Information
ECSD	Operator of treatment plant that received facility wastewater (DCNs 054053 and 054057)
"Gary Development Sanitary Landfill"/"Gary Development Landfill"/"Gary Land Development"	Operator of landfill that received facility waste (DCN 054046)
Industrial Disposal	Transported and disposed of facility waste (DCN 054046)

2.61 VIKING ENGINEERING COMPANY, INC.

Two Viking facility locations are identified in the documents found in the IDEM file rooms. The operations conducted at these two facilities are not identified in the documents reviewed.

2.61.1 Facility Location

A document in the Environmental Response file room discusses a Viking facility located at 175 West Chicago Avenue in East Chicago, Indiana (DCN 054063). A document in the Solid and Hazardous Waste Management files room discusses a Viking facility located at 2300 Michigan Street in Hammond, Indiana (DCN 054065). One Viking facility is located in Priority Reach G, 151st Street to Columbus Drive (IDEM 1996), but Tetra Tech could not determine which facility is in Priority Reach G based on the information available.

2.61.2 Summary of Pertinent Information

The pertinent information presented below on the Viking facilities at 175 West Chicago Avenue in East Chicago, Indiana, and at 2300 Michigan Street in Hammond, Indiana, was drawn from documents in the Environmental Response and Solid and Hazardous Waste Management file rooms, respectively.

Environmental Response File Room

On July 8, 1989, a diesel fuel UST and a gasoline UST were excavated at the Viking facility located at 175 West Chicago Avenue in East Chicago, Indiana. Both USTs were found to be corroded and in 4 to 5 inches of groundwater. Groundwater samples were collected; TCE was detected at 3.5 ppm, and benzene was detected at a level below 5 ppm. Two soil samples collected near the USTs contained TPH at concentrations of 1,300 and 140 ppm (DCN 054063).

Solid and Hazardous Waste Management File Room

On August 3, 1994, Viking sent a notice of a citizen suit to Shell Oil. Viking had purchased a facility located at 2300 Michigan Street, in Hammond, Indiana, from Shell Oil Company in 1979. Subsequently Viking discovered substantial petroleum contamination in soils at this facility. Viking's investigations showed that Shell Oil's past operations at the facility were the source of the contamination. Viking sent Shell Oil the notice of a citizen suit to seek all relief available, including a court order compelling Shell Oil to immediately and fully remediate all environmental contamination existing at the Michigan Street facility (DCN 054065).

Water Management File Room

No documents for either Viking facility were found in the Water Management file room, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in this file room.

2.61.3 Other Possible PRPs

Shell Oil was identified as another possible PRP for the AOA during Tetra Tech's review of the Viking facility files. Shell Oil is the previous owner of a facility located at 2300 Michigan Street in Hammond, Indiana, that was purchased by Viking in 1979 (DCN 054065). A summary of the information in the document copies pertinent to Shell Oil is provided in Section 2.52.

2.62 WILLET TRUCKING

The Willet Trucking (Willet) facility (EPA ID No. IND 000 198 697) is a truck terminal (DCN 054069). The facility is no longer used by Willet; the dates of Willet's operation of the facility are unknown. After Willet ceased its operations at the facility, it was leased to several different companies for use as a truck terminal (DCN 054069). As of 1991, Joseph Stary, Sr., owned the facility and was leasing it to Umthum Trucking and Willey Freight Way, Inc. Companies that have leased the facility transported steel products and castings (DCN 054069). The names Toll Road Terminals and Willet Transports are also used for the facility (DCN 054067).

2.62.1 Facility Location

The Willet facility is located at 3333 Sheffield Avenue in Hammond, Indiana (DCN 054069). This facility is located in Priority Reach G, 151st Street to Columbus Drive (IDEM 1996).

2.62.2 Summary of Pertinent Information

The pertinent information presented below on the Willet facility was drawn from documents in the Environmental Response file room.

Environmental Response File Room

A September 19, 1985, potential hazardous waste site PA states that soil, surface water, and groundwater may have been contaminated by oil spills at the Willet facility. The report also states that on October 24, 1980, spilled oil was observed in a ditch just north of the facility. The ditch discharges to Lake George. According to the report, the site safety officer for the facility stated that he believed that truck crankcase oil was spilled and disposed of on site before 1980 and that used oil was used for dust control at the facility (DCN 054075). A September 19, 1985, ERRIS executive summary for a PA states that oil was spilled at the Willet facility and into a ditch north of the facility. The summary also states that the facility used crankcase oil for dust control and disposed of some quantity of oil on and off site (DCN 054074).

A March 11, 1987, inspection of the Willet facility by EPA and E&E revealed pools of oil, stained soil, wood and rubbish piles, drums, and runoff into a ditch directly adjacent to the facility. The ditch runs along the Willet facility boundary and discharges to Lake George. Analysis of soil samples collected on site during the inspection revealed high concentrations of PAHs and heavy metals, including 21,362 mg/kg of phenanthrene; 25,367 mg/kg of fluoranthene; 33,378 mg/kg of pyrene; 20,027 mg/kg of chrysene; 837 mg/kg of lead; and 30 mg/kg of cyanide. The inspection also revealed a potential for groundwater contamination based on the facility's underlying geology and a shallow aquifer (DCN 054069).

On March 29, 1989, 25 to 30 gallons of 66 Baumeé acid (concentrated sulfuric acid) was released from a semitruck tanker to the roadway at the intersection of Chicago Avenue and Calumet Avenue in Hammond, Indiana. The released acid was being contained and recovered, according to an initial incident report log. The log identifies Willet as the suspected responsible party for the release (DCN 054072).

In March 3, 1995, memorandum of decision regarding the Willet facility, IDEM recommends that the facility be assigned a no further remedial action planned (NFRAP) status. Past Willet operations at the facility had resulted in several oil spills on site, and there was no indication that these spills were cleaned up. Willet reportedly used crankcase oil for dust control at the facility, but this practice reportedly ceased in 1980. As of 1995, the facility operators collected and recycled used oil. Analysis of soil samples

collected on site on March 11, 1987, revealed high concentrations of PAHs and heavy metals (DCN 054067).

Solid and Hazardous Waste Management File Room

No documents for the Willet facility were found in the Solid and Hazardous Waste Management file room.

Water Management File Room

No documents for the Willet facility were found in the Water Management file room, possibly because Tetra Tech reviewed only facility documents dated 1994 to present in this file room.

2.62.3 Other Possible PRPs

Other possible PRPs for the AOA identified in the Willet facility files are presented in Table 2-26. Joseph Stary, Sr.; Umthum Trucking; Willet Transports; and Willey Freight Way, Inc., are newly identified possible PRPs.

TABLE 2-26

OTHER POSSIBLE PRPS ASSOCIATED WITH WILLET FACILITY

Possible PRP	Pertinent Information
Joseph Stary, Sr.	As of 1991, the owner of the facility (DCN 054069)
Umthum Trucking	As of 1991, leased the facility (DCN 054069)
Willet Transports (George Beemsterboer, owner)	Operated at the facility in 1985 (DCNs 054074 and 054075)
Willey Freight Way, Inc.	As of 1991, leased the facility (DCN 054069)

3.0 SUMMARY AND RECOMMENDATIONS

During preparation of this report, Tetra Tech identified other possible PRPs associated with a number of facilities. If Tetra Tech identified information concerning one or more possible PRPs other than the namesake PRP within a facility's documents, these additional PRPs are discussed in the facility summary within the "Other Possible PRPs" section.

The 62 facility summaries presented in this report identify 97 other possible PRPs, of which 82 are newly identified possible PRPs. These parties are presented in Tables 3-1 and 3-2. Table 3-1 lists other possible PRPs identified in facility documents as well as in the list of 100 facilities provided to Tetra Tech by IDEM. Table 3-2 lists the 82 other possible PRPs newly identified during Tetra Tech's review of facility documents. Both tables present the section or sections of this report where each other possible PRP is discussed and the DCN of each facility document where the party is identified.

Based on the information provided in this report, Tetra Tech recommends that IDEM pursue four general follow-up activities. These follow-up activities are general in nature because Tetra Tech has limited knowledge of IDEM's strategy for pursuing PRPs. Instead of conducting all four activities for all the PRPs, Tetra Tech recommends that criteria be established to determine which PRPs are candidates for each of the four activities. Then, using both the established criteria and the information provided in this report, IDEM can develop a list of PRPs that are candidates for each activity. Tetra Tech recommends that one or more of the following four activities be conducted for PRPs that are determined to be appropriate candidates:

1. Conduct corporate and financial research to determine a PRP's corporate history and financial viability.
2. For those of the 62 PRPs addressed in this report that are identified as appropriate candidates, conduct additional research to fill operational and ownership history data gaps and obtain additional evidence of liability. This additional research will vary depending on the PRP but could include such efforts as a title search or additional reviews of files including those in the NRDA file room and in the EPA Region 5 offices in Chicago, Illinois.
3. For newly identified PRPs, review files in the three IDEM file rooms as was done for the 88 previously identified PRPs.
4. For those of 82 newly identified PRPs listed in Table 3-2 and the 26 facilities listed in Table 1-3 for which no information is available in the IDEM file rooms, conduct additional file reviews at federal and local government agencies.

TABLE 3-1

**OTHER POSSIBLE PRPs IDENTIFIED IN FACILITY DOCUMENTS AND
 "DRAFT: POTENTIALLY RESPONSIBLE PARTIES FOR GRAND CALUMET RIVER/
 INDIANA HARBOR SHIP CANAL (GCR/IHSC) CONTAMINATED SEDIMENTS"**

Possible PRP	Section of This Report Where PRP Is Identified	DCN of Facility Document Where PRP Is Identified
A. Metz, Inc.	2.26	IDEM 1996
AMG Resources (Vulcan Materials Company)	2.20	054150 and 052565
ASK Shredders	2.31	052922
Chicago Steel Limited, Inc.	2.8	052313
Conservation Chemical of Illinois	2.22	052676
East Chicago Sanitary District	2.2	054199
	2.7	054257
	2.11	052410
	2.15	054320
	2.34	052973
	2.36	054531
	2.44	053306
	2.50	054326; 053437; 053472 through 053495
	2.52	053558
	2.57	054005 and 054046
	2.58	054022; 054022; 054026; 054030; 054034; 054038
	2.59	054038
	2.60	054053
Gary Sanitary District	2.1	052160
	2.4	052252
	2.6	052301 and 054226
	2.8	052309
	2.10	052332
	2.13	052434
	2.14	052439
	2.19	052558
	2.21	IDEM 1996
	2.24	052808
	2.27	052893
	2.28	IDEM 1996

TABLE 3-1 (Continued)

**OTHER POSSIBLE PRPs IDENTIFIED IN FACILITY DOCUMENTS AND
"DRAFT: POTENTIALLY RESPONSIBLE PARTIES FOR GRAND CALUMET RIVER/
INDIANA HARBOR SHIP CANAL (GCR/IHSC) CONTAMINATED SEDIMENTS"**

Possible PRP	Section of This Report Where PRP Is Identified	DCN of Facility Document Where PRP Is Identified
Gary Sanitary District (Continued)	2.32	052964
	2.38	IDEM 1996
	2.40	IDEM 1996
	2.41	053208
	2.42	053215
	2.46	IDEM 1996
	2.48	053381
	2.53	053572 and 053597
	2.56	053896; 053896; 053898; 053751
Gary Development Company, Inc.	2.3	054219 and 054221
	2.60	054046
Industrial Disposal Corp.	2.60	054046
Metal Recovery Industries, Inc.	2.5	052266
Northwest Family Hospital	2.54	054594
Shell Oil Company	2.61	054065
St. Mary Medical Center	2.41	053208
United States Reduction Company	2.20	054163 and 054404
	2.28	054468
Viking Engineering Company, Inc.	2.52	054064

TABLE 3-2

**NEWLY IDENTIFIED POSSIBLE PRPs IDENTIFIED
SOLELY IN FACILITY DOCUMENTS**

Possible PRP	Section of This Report Where PRP Is Identified	Facility Association	DCN of Facility Document Where PRP Is Identified
6315 Indiana, Inc.	2.38	NEO Industries, Inc. changed its name to 6315 Indiana, Inc. in 1993	053035
Allied Mineral Products, Inc.	2.38	Current operator of NEO Industries, Inc. facility	053025
American Add Mixtures	2.20	Operated a fly ash slurry plant in northeast corner of Gary Development Company, Inc. facility	054128
American Chemical Service	2.20	Generated manifested and unmanifested hazardous wastes sent to Development Company, Inc. facility	054128 and 054171
American Maize	2.20	Sent waste to Development Company, Inc. facility	054172
American Oil Incinerator	2.20	Sent waste to Development Company, Inc. facility	054172
American Recovery Corporation, Inc.	2.50	Operator of Safety-Kleen facility from 1972 to 1987	053437
Atlantic Richfield Company	2.17	Owner and operator of the Energy Cooperative, Inc., facility from 1968 to 1976	052492
ARCO Petroleum	2.17	Operator of the Energy Cooperative, Inc., facility as of 1991	052492
Arnold House	2.26	Current owner and operator of House's Junk Yard facility	052820
Associated Box Company	2.50	Purchased Safety-Kleen facility in 1972	053470
Beckstein Construction	2.24	Landfill contractor at Gary Sanitary Landfill facility	052726
BP Exploration & Oil	2.56	Involved in remediation of free product and contamination at Truckstops of America facility	053751
Breslube Holding Corp.	2.50	In 1987, "legal owner and operator" of	053464

TABLE 3-2 (Continued)

**NEWLY IDENTIFIED POSSIBLE PRPs IDENTIFIED
SOLELY IN FACILITY DOCUMENTS**

Possible PRP	Section of This Report Where PRP Is Identified	Facility Association	DCN of Facility Document Where PRP Is Identified
Breslube USA, Inc.	2.50	Former operator of Safety-Kleen facility (1987 to 1988)	053437
Clark Oil Company	2.50	After 1987, leased a portion of Safety-Kleen facility	053437
Calumet Waste	2.20	Sent waste to Gary Development Company, Inc. facility	054172
Cardinal Service, Inc.	2.55	Owner of Tri State facility	053695
Center Point Properties, Inc.	2.38	Current owner of NEO Industries, Inc. facility	053035
City of East Chicago	2.16	Rinsed used industrial drums along Grand Calumet River	052448
	2.17	Owner of Energy Cooperative, Inc., facility as of 1989	052492
City of Gary, Indiana	2.22	Established Gary Regional Airport	053667
	2.23	Established Gary Development Company, Inc.	IDEM 1996
	2.24	Operated the Gary Sanitary Landfill facility	052798
Cities Service Company	2.11	Facility Citgo operator from 1929 to 1983, created Citgo in March 1983	052395
"City Water Department"	2.9	Owner of two-thirds of waste lime pit at Chicago Flame facility	052326
Concrete Company	2.50	Contamination present at Breslube-owned Concrete Company property	053454
Congress Enterprises	2.24	Landfill contractor at Gary Sanitary Landfill facility	052726 and 052750
Cooke Family	2.26	Owner of the House's Junk Yard facility for 40 years	052820
Cooperative Petroleum Inc.	2.17	Former name of Energy Cooperative, Inc., facility	052533

TABLE 3-2 (Continued)

**NEWLY IDENTIFIED POSSIBLE PRPs IDENTIFIED
SOLELY IN FACILITY DOCUMENTS**

Possible PRP	Section of This Report Where PRP Is Identified	Facility Association	DCN of Facility Document Where PRP Is Identified
Cummins Mid-States	2.13	Former name of Cummins Northern Illinois facility	052431
East Chicago Property Improvement Corporation	2.17	Owner of Energy Cooperative, Inc., facility	052484
Ensis, Inc.	2.38	NEO Industries, Inc. facility operator from 1992 to 1993	053035
Enterprise Center I, L.P.	2.49	Owens the Rubber Material Handling property at 4407 Railroad Avenue	053390
Flying JJ Care	2.19	Document in file refers to operator of Flying J Inc. facility as Flying JJ Care	052553
	2.23	Industrial discharger to Gary Sanitary District	054438
Gary Hobart Water Corporation	2.42	Northwest Indiana Water Company formerly known as Gary Hobart Water Corporation	053215
Gary Products, Inc.	2.6	Former operator of Beaver Oil facility	052272
Gates City Steel Corporation	2.38	Former operator of and waste generator at NEO Industries, Inc. facility	053035
General Drainage	2.20	Sent oil waste to Gary Development Company, Inc. facility	054163
Indiana Waste Systems, Inc.	2.24	Owens property adjacent to Gary Sanitary Landfill facility	052781
International Knife and Saw, Inc.	2.8	Tenant of Chase Street Industrial Center facility	052313
	2.23	Industrial discharger to Gary Sanitary District facility	054418
Joseph Sary, Sr.	2.62	"Current" owner of Willet facility	054069
Kenwood Steel Processing, Inc.	2.8	Tenant of Chase Street Industrial Center facility	052313
	2.23	Industrial discharger to Gary Sanitary District facility	054418

TABLE 3-2 (Continued)

**NEWLY IDENTIFIED POSSIBLE PRPs IDENTIFIED
SOLELY IN FACILITY DOCUMENTS**

Possible PRP	Section of This Report Where PRP Is Identified	Facility Association	DCN of Facility Document Where PRP Is Identified
Laidlaw Waste Systems	2.28	Owner of Industrial Disposal Corp. facility	054466
Lake Materials	2.11	As of 1991, operator of active surface impoundment with liquid waste and sludge across the street from Citgo facility	052381
Linde Gas Specialty	2.44	Named on documents as operator of Praxair, Inc. facility	053281
LTV Steel-Indiana Harbor Works	2.20	Generated hazardous waste sent to Gary Development Company, Inc., facility	054128
McKewn Transportation Company	2.44	Leases Praxair, Inc. property at 211 East Columbus in East Chicago, Indiana where contamination was detected	053288
Mercier	2.38	Stored "toxic chemicals" at NEO Industries, Inc. facility	053018
Mid-American Waste Systems of Indiana, Inc.	2.24	Conducting business as Gary Sanitary Landfill	052725
Montgomery Tank Lines	2.6	Former operator of Beaver Oil facility	052272
NEO Industries Indiana, Inc.	2.38	Purchased NEO Industry, Inc. assets	053064
Niemeyer Aviation	2.22	Lessee of leaking AST at Gary Regional Airport facility	052645
NIPSCO Industries, Inc.	2.40	Subsidiary of NIPSCO Mitchell Generating Station	053112
"Old Dutch Refinery"	2.50	Former operator of Safety-Kleen facility (1930s)	053443
Peerless Potato Chips, Inc.	2.23	Industrial discharger to Gary Sanitary Landfill	054446
Petroleos de Venezuela, South America	2.11	Half-owner of Citgo (September 1983), then full owner of Citgo (1990) facility	052395
Reagent Chemical and Research, Inc.	2.6	Owner of acid product spilled at Beaver Oil facility	052272
Ronning Oil Corporation	2.11	Owner and operator of Citgo service station	052344

TABLE 3-2 (Continued)

**NEWLY IDENTIFIED POSSIBLE PRPs IDENTIFIED
SOLELY IN FACILITY DOCUMENTS**

Possible PRP	Section of This Report Where PRP Is Identified	Facility Association	DCN of Facility Document Where PRP Is Identified
Safety-Kleen Corporation	2.50	Other name used to refer to Safety-Kleen facility	053437
Select-Canfield Enterprises LLC	2.1	Former name of American Juice facility	052155
Select Enterprises, L.L.C.	2.1	Former name of American Juice facility	052155
SET Environmental, Inc.	2.57	Allegedly responsible for a spill at Union Tank facility	053952
Shell Pipe Line Corporation	2.52	Operator of Shell Oil Company facility	053517
Sinclair Oil Company	2.17	Owner and operator of Energy Cooperative, Inc. facility from 1924 to 1968	052492
Summerfield GMC Trucking Company	2.19	Former name of Flying J Inc. facility	052553
The Budd Company	2.10	Former operator of Chicago Steel facility	052328
The Southland Corporation	2.11	Former half- owner of Citgo facility (September 1983 to 1990)	052395
Thomas Greene	2.26	Resided and illegally dumped waste on House's Junk Yard facility property	052877
Tinplate Partners International, Inc.	2.8	Tenant of Chase Street Industrial Center facility	052313
	2.23	Industrial discharger to Gary Sanitary District facility	054418
UCISCO, Inc.	2.44	Wholly owned subsidiary of Praxair, Inc. facility	053305
Umthum Trucking	2.62	Current lessee of Willet facility	054069
Union Carbide	2.9	Former operator of Chicago Flame facility	052326
Union Carbide Corporation Linde Division	2.44	Named in Praxair, Inc. facility documents as operator of facility	053291
Union Carbide Industrial Gases, Inc.		Former name and operator of Praxair, Inc. facility	053305

TABLE 3-2 (Continued)

**NEWLY IDENTIFIED POSSIBLE PRPs IDENTIFIED
SOLELY IN FACILITY DOCUMENTS**

Possible PRP	Section of This Report Where PRP Is Identified	Facility Association	DCN of Facility Document Where PRP Is Identified
United States Army	2.22	Formerly used Gary Regional Airport facility property as an airfield and for maintenance	052679
United States War Department	2.38	Former operator and waste generator at NEO Industries, Inc. facility	053035
Unspecified chemical company from Kingsbury, Indiana	2.29	Potential owners of drums that leaked chlorine at Industrial Scrap facility	052911
Vuclan Materials Company	2.3	Owner and operator of AMG Resources Corporation facility until 1988	054221
	2.20	May have been the source of waste draining onto the Gary Development Company, Inc. facility	054150
Western Detroit Diesel-Allison	2.30	Prior to 1993, Inland Detroit was Western Detroit Diesel-Allison	052921
Western Steel Group, Inc.	2.46	Former owner of RESI facility at 4000 East 7th Avenue in Gary, Indiana	053375
Willet Transports - George Beemsterboer, owner	2.62	Operated Willet facility in 1985	054074
Willey Freight Way, Inc.	2.62	As of 1991, leased the Willet facility	054069
Zeitner & Sons, Inc.	2.19	Zeitner & Sons, Inc., had a spill in its own truck at the Flying J Inc. facility	052546

REFERENCE

Indiana Department of Environmental Management (IDEM). 1996. "Draft: Potentially Responsible Parties for Grand Calumet River/ Indiana Harbor Ship Canal (GCR/IHSC) Contaminated Sediments." June 26.